

EXHIBIT A

Erratum

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1 A. Yes.

2 Q. Okay.

3 A. A and B are for the females.

4 Q. And you told me earlier that Spann was

5 the only male arrestee that was being housed at the

6 11th at the time when you got there?

7 A. I believe so, yes.

8 Q. Okay. Now, when you were walking

9 Lumar into E2 or down the cell block, was he still

10 ticked off, for lack of a better word, saying "this

11 is bullshit"?

12 A. He stopped talking after he came --

13 like, when we started walking down the cell block,

14 he didn't say anything else to me.

15 Q. So did you have any conversation at

16 all with Lumar at any time after calming him down

17 after he said "this is bullshit"?

18 A. No.

19 Q. And you said you got him into his cell

20 within five minutes?

21 A. Yes.

22 Q. Did he at any time ask to make a phone

23 call?

24 A. I asked him. He said no.

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1 conversation like we are now, no.

2 Q. Okay. The current video surveillance

3 system, is there audio on that?

4 A. No.

5 Q. And I think you told me this, but it's

6 the custom and practice that each arrestee gets its

7 own cell until you start to get too many?

8 A. We don't have to give them their own

9 cell. That's just how we do it.

10 Q. And that was how you did it in 2016?

11 A. Correct.

12 Q. All right. When was the next time you

13 had contact with Tyler Lumar?

14 A. When I cut him down and started CPR on

15 him.

16 Q. How were you alerted to the fact that

17 he was hanging?

18 A. Chuck was doing 15-minute checks and

19 he yelled out my name and when I looked down the

20 cell block and said "what's up," he said, "this guy

21 is hanging," so I grabbed a key, went down there,

22 and, yeah, he was hanging.

23 Q. When you say "key," what key?

24 A. The cell block key. Or the cell door

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1 Q. When did you have that conversation

2 that you asked -- or when did you ask him about the

3 phone call?

4 A. Right when he came in. When he said

5 "this is bullshit," I said, "you're going to make a

6 phone call?" "No, man." "All right, come on, let's

7 go to your cell."

8 Q. Anything else you recall him saying?

9 A. No.

10 Q. When you took Lumar into his cell, did

11 you have any conversation with Erik Spann or did

12 Erik Spann say anything or yell out anything?

13 A. No.

14 Q. When you're sitting at the 11th -- or

15 strike that.

16 When you're sitting at the desk in

17 lockup, would you be able to overhear conversations

18 between inmates that are in the cells?

19 MS. DAVENPORT: Objection, incomplete

20 hypothetical, calls for speculation.

21 BY MS. O'CONNOR:

22 Q. You can answer.

23 A. I mean, if they are talking loud,

24 yeah. If they are just having a normal, like,

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1 key.

2 Q. Where is that typically kept?

3 A. At the desk.

4 Q. And specifically, what was Tyler Lumar

5 hanging from?

6 A. His tank top or his shirt.

7 Q. Was his shirt on his person, or had he

8 taken it off?

9 A. He had taken it off, tied it to the

10 bars, and he had tied it around his neck.

11 Q. Which bar did he tie it to?

12 A. I don't know what you're asking.

13 Q. Well, what did he tie the shirt to

14 specifically in the cell?

15 A. The bars. I mean, I don't --

16 Q. The bars that open and shut the cell?

17 A. No. It's a stationary one, stationary

18 bar.

19 Q. Okay. I think I'm going to have to

20 get a picture. I have to go print that out real

21 quick. But before I do, let me just keep going

22 through these questions.

23 A. So, like, there's a gate that opens

24 and then there's the bars that are stationary. He

21 (Pages 81 to 84)

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1 hung it up on the stationary ones.
 2 Q. Okay. So he would have been
 3 shirtless, correct?
 4 A. I don't remember if he had, like, a
 5 tank top on or used a shirt. I know it was one of
 6 the shirts, though.
 7 Q. Do you recall if he had his shoes on
 8 or off?
 9 A. I believe they were on.
 10 Q. Did you observe any blood or vomit
 11 when you first arrived at the scene?
 12 A. No.
 13 Q. Now, you said that you had actually
 14 physically cut him down, correct?
 15 A. Correct.
 16 Q. What did you use to cut him down?
 17 A. A pocketknife.
 18 Q. Is that something you just typically
 19 keep on your person?
 20 A. No. I had to run to my locker and
 21 grab it.
 22 Q. And where is your locker?
 23 A. It's in the lockup. So, like, in our
 24 lockup there's, like, a little back office thing

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1 that we keep locked, so it's right back there. We
 2 all -- each of us have our own little cabinet or
 3 locker or drawer.
 4 Q. Are you allowed to carry a weapon?
 5 A. No.
 6 Q. So would that include knives?
 7 A. Right. That's why I don't carry it
 8 with me.
 9 Q. Is there some Chicago Police
 10 Department-issued weapon or utility that you have at
 11 the 11th District to cut down people that hang
 12 themselves?
 13 A. Scissors.
 14 Q. Scissors?
 15 A. I mean, that's the only thing we have
 16 in our lockup that we could have used besides a
 17 pocketknife.
 18 Q. When you went through your training,
 19 were you trained on that at all, what to do in the
 20 case that you found an arrestee hanging from their
 21 cell?
 22 A. Yeah. I mean, they just told us we
 23 had to call up front, notify them, and try to get
 24 something to bring them down with.

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1 Q. So the scissors that you're
 2 referencing, is it just typical scissors or is it
 3 some special scissors that's here in case, you know,
 4 you find this --
 5 A. Oh. The ones that they have back
 6 there were just regular scissors for us to cut up
 7 stuff with.
 8 Q. All right. So you had to go back to
 9 your locker to get your pocketknife. Does your
 10 locker have a physical lock on it?
 11 A. Yeah. Well, it's -- yeah.
 12 Q. Like an old school --
 13 A. It's a Master lock, but it's not key
 14 or combo, it's a directional so it's quicker.
 15 Q. Okay. So approximately how long did
 16 it take you to run from the cell to the locker?
 17 A. Oh, it was under a minute.
 18 Q. Do you recall physically what he did
 19 with the shirt in terms of, like, how many knots
 20 there were, whether he ripped it, anything like
 21 that?
 22 A. No. I wasn't worried about that. I
 23 was worried about trying to help him out.
 24 Q. Tell me about your observations of

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1 Lumar before you cut him down. Like, when you first
 2 arrived did he appear to be responsive in any way?
 3 A. No.
 4 Q. Were his eyes open or shut?
 5 A. They were shut.
 6 Q. Was he making any noises at all?
 7 A. No noises.
 8 Q. How long after you brought Lumar into
 9 the lockup was it that Charles Barry yelled for you?
 10 A. I want to say it was almost like ten
 11 minutes.
 12 Q. What happened after you cut him down?
 13 Did you hold him when you were cutting him? Did he
 14 fall to the floor?
 15 A. Well, I ended up picking up his body
 16 while Chuck used the knife to cut it, the shirt.
 17 Q. Okay. So you handed the knife to
 18 Chuck and he physically cut it?
 19 A. Uh-huh.
 20 Q. Is that a yes?
 21 A. Yes.
 22 Q. Okay. At this point when you are
 23 holding up or picking up his body or at any time up
 24 until the point that he was transported to the

22 (Pages 85 to 88)

EXHIBIT B

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1 desk sergeant.
2 Q. Okay. Did you search Tyler Lumar when
3 he returned from Cook County Jail?
4 A. No.
5 Q. Do you know if anyone did?
6 A. I don't know.
7 Q. What did you do after you delivered
8 the paperwork to the desk sergeant?
9 A. Came back to the lockup.
10 Q. What did you do after you came back to
11 the lockup?
12 A. I don't remember.
13 Q. When was the next time -- strike that.
14 By the time you came back to the
15 lockup, was Lumar already in the cell?
16 A. Yes.
17 Q. When was the next time you saw Lumar?
18 A. On my checks.
19 Q. When you say "on my checks," what do
20 you mean?
21 A. The times that I sign the book.
22 Q. And referring back to Exhibit 49.
23 A. Right.
24 Q. You had performed the checks,

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1 in the cell, did you observe him at any other time
2 after you came back into the lockup after you
3 delivered the paperwork to the desk sergeant?
4 A. On my checks.
5 Q. Okay. So you had seen Lumar during
6 your checks before he was found unconscious?
7 A. Correct.
8 Q. Do you know how many checks you had
9 performed of Lumar before you found him unconscious?
10 A. I don't remember.
11 Q. Okay. Can you tell me what -- strike
12 that.
13 In the checks that you performed
14 before you found him unconscious, do you recall
15 anything about your observations of Lumar?
16 A. No.
17 Q. Can you tell me what you do recall
18 specifically when you found him, quote, unconscious?
19 A. I don't understand the question.
20 Q. Sure. Well, I'm just trying to direct
21 your attention to this entry.
22 A. Right.
23 Q. Tell me what you recall when you
24 performed your check and you found Tyler Lumar, as

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1 according to page 2, from 9:45 up until 11:15 on
2 August 19th; is that correct?
3 A. Yes.
4 Q. And there's an entry, sir, where it
5 says, "At 11:15, unconscious." Do you see where I'm
6 reading?
7 A. That's an additional comment?
8 Q. Right here, sir.
9 A. Oh, yeah. And that's the CB number,
10 so that's who it is.
11 Q. That number, 19358301, is Tyler
12 Lumar's CB number?
13 A. Correct.
14 Q. Okay. Now, did you write that word,
15 "unconscious," and then his CB number?
16 A. Yes.
17 Q. Why did you write that?
18 A. Because he was unconscious.
19 Q. Okay. So this entry that you have the
20 word "unconscious," that pertains to the point at
21 which you discovered Lumar unconscious in his cell;
22 is that correct?
23 A. Yes.
24 Q. Prior to observing Lumar unconscious

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1 you documented it, unconscious. But how did you
2 find him initially? Was he hanging?
3 A. At that time.
4 Q. Okay. So that's what I want to know,
5 sir. I want to know about the cell check that you
6 were performing when you first discovered that there
7 was a problem with Lumar. What did you see when you
8 first came to the cell?
9 A. I seen him hanging.
10 Q. Okay. Specifically where was he
11 hanging?
12 A. Meaning?
13 Q. Can you describe where he was hanging
14 at? If you had to tell me as if I had never been
15 there.
16 A. I don't remember.
17 Q. Was he hanging from the cell, the
18 bars?
19 A. Yes.
20 Q. Do you recall what he was wearing?
21 A. No.
22 Q. Was there anyone else in the cell with
23 him?
24 A. No.

21 (Pages 81 to 84)

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1 Q. Do you recall how he was hanging from
2 the cell, with what instrumentality or what -- how
3 did he --
4 A. I don't remember.
5 Q. Okay. Do you recall what you did
6 after you found him hanging?
7 A. I called for my two coworkers.
8 Q. When you say call, was that, like, you
9 screened or over a radio?
10 A. Verbally to bring a key because they
11 have to unlock the cell.
12 Q. Okay. As the detention aide, did you
13 have keys on you that could unlock the cell?
14 A. We have keys at the desk.
15 Q. Like, one main set?
16 A. Yeah.
17 Q. And who -- the two coworkers, who
18 were they that were working with you that day?
19 A. John Granat and then the other John.
20 What was his name?
21 Q. John Errum?
22 A. Errum.
23 Q. All right. And did you -- when you
24 first came upon Lumar, did you touch him in any way?

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1 A. No. I cut whatever he was hanging
2 with.
3 Q. Did you have something on your person
4 that you were able to cut him down?
5 A. Yes.
6 Q. What was that?
7 A. A knife.
8 Q. Like a pocketknife?
9 A. Yes.
10 Q. And who came with the keys?
11 A. I don't remember which one. It was --
12 I work with two other people. Somebody had the
13 keys. Someone held him while I cut him down.
14 Q. All right. So someone held up his
15 body while you cut him down?
16 A. Yes.
17 Q. What did you do after you cut him
18 down?
19 A. I let the desk sergeant know what was
20 going on.
21 Q. Do you recall who that was?
22 A. No, I don't.
23 Q. Did you -- were you involved in
24 performing any CPR on Lumar?

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1 A. No. A female named Brigid. She was
2 working on the female side, and she performed mouth
3 to mouth on him until the paramedics got there.
4 Q. Were you still at the scene when the
5 paramedics arrived?
6 A. Yes.
7 Q. Did you have any discussions with the
8 paramedics?
9 A. No.
10 Q. Do you recall how many checks you
11 performed on Lumar before you found him hanging?
12 A. I don't remember.
13 Q. Was Sergeant Dan McCall present?
14 A. He was in the garage.
15 Q. Did you go and get him?
16 A. I don't remember, but he was the first
17 sergeant on the scene.
18 Q. When you say "on the scene," you mean
19 by the cell where you found Lumar?
20 A. Right.
21 Q. Was Brigid already at the cell by the
22 time you cut Lumar down?
23 A. No.
24 Q. On August 19th of 2016, did you know

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1 how to perform CPR?
2 A. Yes.
3 Q. Is there any reason why you didn't do
4 it?
5 MS. DAVENPORT: Object to the form of
6 the question.
7 BY THE WITNESS:
8 A. No. I don't know.
9 BY MS. O'CONNOR:
10 Q. When you cut him down, it sounds like
11 you don't remember specifically what other detention
12 aide was with you, but there was --
13 A. I had two coworkers.
14 Q. They were both there at that point?
15 A. Right. Well, Gartner, he's CPD.
16 Q. Meaning he's a police officer?
17 A. Right.
18 Q. When you first saw Lumar hanging, did
19 you hear him make any noises?
20 A. I don't recall.
21 Q. Did you see any vomit in the cell?
22 A. I don't recall. I was just trying to
23 get him down.
24 Q. Do you recall seeing any blood in the

22 (Pages 85 to 88)

EXHIBIT C

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1 had other officers to deal with. And at some point,
 2 I believe it was Sergeant McCall came up to the desk
 3 and said, we need you in the lockup now, bring the
 4 AED. Then I knew something was a little more
 5 serious.
 6 Q. So when you recalled Barry calling the
 7 desk, was that from a phone?
 8 A. From the phone, yes.
 9 MS. RYAN: Objection, foundation.
 10 BY MS. O'CONNOR:
 11 Q. And, like, the lockup phone?
 12 A. Just a phone that is in the lockup,
 13 call the desk.
 14 Q. So you were actually sitting in the
 15 main desk at this point?
 16 A. I was sitting in the front of the
 17 station nowhere near the lockup.
 18 Q. Got it. All right. So the first call
 19 that you received from Detention Aide Barry simply
 20 said, we need you in the lockup, but he didn't
 21 indicate why?
 22 A. No.
 23 Q. Is that correct?
 24 A. That's correct.

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1 Q. Okay. Then you continued to process
 2 the inventory and do the other things that --
 3 A. Doing my desk duties, yes.
 4 Q. And then approximately how long later
 5 was it that Sergeant McCall called?
 6 A. Sergeant McCall physically came up and
 7 got me about a minute later.
 8 Q. Did you grab the AED?
 9 A. It's right behind the desk, right
 10 behind my desk.
 11 Q. So did you grab it?
 12 A. Yes, I did.
 13 Q. Why don't you tell me what you did
 14 after Sergeant McCall physically came to get you at
 15 the desk.
 16 A. Grabbed the AED, we went in the
 17 lockup, we saw Mr. Lumar, we put the electrodes from
 18 the AED on there, followed the instructions, said do
 19 not shock, we did not, we waited for the CFD
 20 ambulance to show up, and they did whatever they
 21 did.
 22 Q. Okay. At the point that you got to
 23 the scene or got to the cell with Sergeant McCall,
 24 was Lumar still hanging, or was he on the ground at

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1 this point?
 2 A. He was on the ground.
 3 Q. And who, if anyone else, was within,
 4 you know, feet of Lumar when you first arrived at
 5 him?
 6 MS. RYAN: Objection, form.
 7 BY THE WITNESS:
 8 A. Barry, McCall, myself. I don't know
 9 who else. Whoever else was working in the lockup
 10 was probably there.
 11 BY MS. O'CONNOR:
 12 Q. Do you recall hearing any noises by
 13 Lumar at any time when you got to his cell up until
 14 the point that he left with the EMS?
 15 MS. RYAN: Objection, form.
 16 BY THE WITNESS:
 17 A. No.
 18 BY MS. O'CONNOR:
 19 Q. Did you at any time administer CPR?
 20 A. No.
 21 Q. Did you observe anyone administer CPR?
 22 A. No. Unless the fire department did.
 23 Q. Do you know who called the fire
 24 department?

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1 A. I believe it was Sergeant McCall.
 2 Q. And do you know how he called them,
 3 meaning through dispatch --
 4 A. On the radio.
 5 Q. Okay. And when you say "on the
 6 radio," that's through dispatch?
 7 A. Police radio, through dispatch,
 8 dispatch and ambulance to the lockup.
 9 Q. Does that go through OEMC?
 10 A. Yes.
 11 Q. Did you see any blood at the scene?
 12 MS. RYAN: Objection to form.
 13 BY THE WITNESS:
 14 A. I don't recall if there was or not.
 15 BY MS. O'CONNOR:
 16 Q. Do you recall if there was any vomit?
 17 A. I don't recall.
 18 Q. Approximately how long were you at the
 19 scene until EMS arrived?
 20 A. They were there within a minute or
 21 two.
 22 Q. And after EMS arrived, what did you
 23 do?
 24 A. Secured the lockup, went back up to

19 (Pages 73 to 76)

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**PLAINTIFF'S
 EXHIBIT**

tabbles

C

EXHIBIT D



- 3) The Chicago Police Department's provision of "cut-down" tools also known as "911 rescue knives," or any other devices or implements facilitate the rescue of arrestee/prisoners, to Chicago Police Officers and Detention Aides assigned to guard arrestee/prisoners in Chicago Police Department lockups and detention facilities.
- 4) The City of Chicago's compliance with the Illinois Administrative Code, Municipal Jail and Lockup Standards, Ill. Admin. Code tit. 20, § 720 et. seq.

Plaintiff requests that the City of Chicago provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on the City of Chicago's behalf.

This deposition shall commence on August 17, 2020 at 19 S. LaSalle St. Suite 1200, Chicago, IL 60622, or at a date available for all parties and shall be taken before a duly certified court reporter and notary public or other person authorized by law to administer oaths. The deposition will be recorded by stenographic means.

Dated: July 31, 2020

Respectfully Submitted,

By: /s/ Eileen M. O'Connor
Eileen M. O'Connor, # 06290372
O'CONNOR LAW GROUP LLC
19 S. LaSalle, Suite 1900
Chicago, IL 60603
(312) 236-1814
eoc@oconnorlawgrp.com

CERTIFICATE OF SERVICE

Under penalties as provided by law, the undersigned certifies that copies of the above were served on the above parties via electronic mail to all attorneys of record prior to 5:00 p.m. on July 31, 2020

s/Eileen M. O'Connor

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, as Plenary Guardian of the
Estate and Person of TYLER LUMAR

Plaintiff,

v.

THE CITY OF CHICAGO, a Municipal
Corporation, et al.,

Defendants.

No. 17 CV 5859

NOTICE OF DEPOSITIONS

TO: Attorneys of Record - See Attached Service List

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure Rule 30, we will take the depositions of the following individuals, on the following dates:

Deponent

Daniel Warren
Carolos Vega
Corina Esteban
Kevin Geyer
Jonathan Errum

Date

April 25, 2019@10:00 a.m.
April 25, 2019@1:00 p.m.
April 25, 2019@3:30 p.m.
April 26, 2019@10:00 a.m.
April 26, 2019@1:00 p.m.

The depositions shall take place at the O'Connor Law Group LLC, 140 S. Dearborn Street, Suite 320, Chicago, Illinois, 60603. The depositions shall be recorded stenographically.

Dated: March 19, 2019


Respectfully Submitted,

By: /s/ Eileen M. O'Connor
Eileen M. O'Connor, # 06290372
O'CONNOR LAW GROUP LLC
140 S. Dearborn, Suite 320
Chicago, IL 60603
(312) 236-1814
eoc@oconnorlawgrp.com



CERTIFICATE OF SERVICE

Under penalties as provided by law, the undersigned certifies that copies of the above were served on the above parties via electronic mail to all attorneys of record prior to 5:00 p.m. on March 19, 2019.



RE: Alcorn v. City of Chicago
Court No. 17 CV 5859

SERVICE LIST

ATTORNEY FOR CITY OF CHICAGO

Terrence M. Burns
Elizabeth Ekl
Paul Michalik
Daniel M. Noland
Katherine C. Morrison
Daniel J. Burns
Reiter Burns LLP
311 S. Wacker Drive, Suite 5200
Chicago, IL 60606
312-982-0090
tburns@reiterburns.com
eekl@reiterburns.com
pmichalik@reiterburns.com
dnoland@reiterburns.com
kmorrison@reiterburns.com
dburns@reiterburns.com

**ATTORNEY FOR DANIEL WARREN, CARLOS VEGA,
JAMES JONES, ALAN LASCH, CORRINA ESTEBAN,
KEVIN GEYER, WESLENE O'DONNELL AND JONATHAN ERRUM**

Elaine C. Davenport
Sanchez Daniels & Hoffman, LLP
333 W. Wacker Drive, Suite 500
Chicago, IL 60606
312-641-1555
312-641-3004 (fax)
EDavenport@SanchezDH.com

**ATTORNEY FOR DART, COOK COUNTY, WLODARSKI, CRAWFORD, GARMON,
LEON, LATHAM, LEWIS and JONES-TAPIA**

John Power
Jenna Ann McMahon
Cook County State's Attorney's Office
50 W. Washington Street
Chicago, IL 60602
312-603-4370 – John Power
312-603-4327 – Jenna McMahon
John.Power@cookcountyil.gov
Jenna.McMahon@cookcountyil.gov

EXHIBIT F



City of Chicago
Rahm Emanuel, Mayor

Department of Law
Edward Siskel
Corporation Counsel

JASON MARX
Assistant Corporation Counsel
Federal Civil Rights Litigation
30 North LaSalle, Suite 900
Chicago, Illinois 60602
(312) 744-1975
jason.marx@cityofchicago.org

November 17, 2017

Eileen M. O'Connor
O'Connor Law Group LLC
140 S. Dearborn, Suite 320
Chicago, IL 60603

Kevin Kocim
Assistant State's Attorney
Civil Rights Section
Cook County State's Attorney's Office
500 Daley Center
Chicago, Illinois 60602

Devlin Schoop, Senior Counsel
Shawn Barnett, Assistant Corporation Counsel
Allison Romelfanger, Assistant Corporation Counsel
City of Chicago, Department of Law
30 N. LaSalle Street, Suite 900
Chicago, Illinois 60602

Re: *Lisa Alcorn v. City of Chicago, et al.*, 17 C 5859

Counsel,

Enclosed please find Defendants' Responses to Mandatory Initial Discovery with a CD containing bate stamped documents FCRL 1-2664. Thank you.

Sincerely,

/s/ Jason Marx

Jason Marx
Assistant Corporation Counsel

Enclosures as above



IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff,)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

**DEFENDANTS' WARREN, VEGA, ESTEBAN, CONNER, MASTERS, JONES,
ALEXANDER, VINSON, LASCH, GEYER, O'DONNELL, GARTNER, BARRY, AND
PEALS RESPONSE TO MANDATORY INITIAL DISCOVERY**

Defendants Daniel Warren, Carlos Vega, Corrina Esteban, Justin Conner, Dany Helwink-Masters, James Jones, Dietrice Alexander, Peter Vinson, Alan Lasch, Kevin Geyer, Weselene O'Donnell, John Gartner, Charles Barry, and Kimoni Peals, (collectively herein "Defendants") by and through their attorneys, Caroline Fronczak, senior Counsel, Jason Marx, Assistant Corporation Counsel, and Jessica Gomez-Feie Assistant Corporation Counsel, for their Response to Mandatory Initial Discovery pursuant to the standing order regarding the Mandatory Initial Discovery Pilot Project, state as follows:

1. State the names and, if known, the addresses and telephone numbers of all persons who you believe are likely to have discoverable information relevant to any party's claims or defenses, and provide a fair description of the nature of the information each such person is believed to possess.

RESPONSE:

- 1) Defendant Daniel Warren, Star No. 17444, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Warren may have knowledge

of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

- 2) Defendant Carlos Vega, Star No. 17477, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Walsh may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 3) Defendant Corrina Esteban, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Esteban may have knowledge of her training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 4) Defendant Justin Conner, Star No. 18863, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Conner may have knowledge his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 5) Defendant Dany Helwink Masters, Star No. 261, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Masters may have knowledge of her training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 6) Defendant James Jones, Star No. 73, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Jones may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

- 7) Defendant Dietrice Alexander Star No. 7662, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Alexander may have knowledge of her training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 8) Defendant Peter Vinson Star No. 17066, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Vinson may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 9) Defendant Alan Lasch, Star No. 1434, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Lasch may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 10) Defendant Kevin Geyer, Star No. 1679, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Geyer may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 11) Defendant Weslene O'Donnell, Star No. 2167, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant O'Donnell may have knowledge of her training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 12) Defendant Sgt. John Gartner, Star No. 2523, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Gartner may have knowledge

of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

13) Defendant Charles Barry, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Barry may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

14) Defendant Kimoni Peals, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through defense counsel only. Defendant Peals may have knowledge of his training and the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

15) Plaintiff Lisa Alcorn, may have knowledge regarding the allegations contained in the Complaint, any alleged damages she claims that Tyler Lumar suffered in connection with the events that are the subject of this lawsuit, as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants, including Lumar's criminal history and convictions, if any.

16) Defendant T. Wlodarski, Cook County Sheriff's Office, this individual may be contacted through his attorney only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

17) Cook County Sheriff's Department Lieutenant A. Lewis, this individual may be contacted through the legal department for the Cook County Sheriff's Department. This individual may have knowledge regarding LUMAR's alleged possession of narcotics during the processing in the bullpen area at or near the location of the criminal courthouse.

- 18) Chicago Police Detective Marc Leavitt, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 19) Chicago Police Detective William Fiedler, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 20) Chicago Police Officer Daniel McCall, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 21) Chicago Police Officer Greg Roszkowski, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 22) Chicago Police Department employee Jonathan Errum, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.
- 23) Chicago Police Officer Brigid Menoni, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events

that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

24) Chicago Police Officer John Granat, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

25) Chicago Police Officer R. Zasiebida (Star 417), this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of LUMAR's prior arrest and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

26) Chicago Police Officer M. Scott (Star 342), this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of LUMAR's prior arrest and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

27) Chicago Police Officer Thomas Gannon (Star 9694), this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of LUMAR's arrest for narcotics possession on August 19, 2016 and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

28) Chicago Police Evidence Technician Angelo Marconi, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding recovery of evidence following LUMAR's suicide attempt.

- 29) Chicago Police Evidence Technician Elizabeth Vera, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding recovery of evidence following LUMAR's suicide attempt.
- 30) Chicago Police Sergeant Thomas Mitchell, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.
- 31) Chicago Police Sergeant Erik Madsen, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.
- 32) Chicago Police Officer Michael Bertini, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.
- 33) Chicago Police Officer Patrick Cradick, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.
- 34) Chicago Police Officer Roger Bay, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.
- 35) Chicago Police Officer Walter Delgado, this individual may be contacted through counsel Defendant City of Chicago only. This individual may have knowledge regarding

LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

36) Chicago Police Officer Kevin Wortham, this individual may be contacted through counsel Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

37) Chicago Police Department employee A. McGuire, this individual may be contacted through counsel Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

38) Chicago Police Department employee R. Kincaid, this individual may be contacted through counsel Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

39) Chicago Fire Department paramedic Luis Velez, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

40) Chicago Fire Department paramedic Tristan Lopez, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

- 41) Chicago Fire Department Lieutenant Marlon Woods, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.
- 42) Chicago Fire Department firefighter Wade, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.
- 43) Chicago Fire Department firefighter Orroyo, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.
- 44) Chicago Fire Department firefighter Unknown name, employee number 21216, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.
- 45) Casey Tencate, current contact information unknown, this individual may have knowledge relating to LUMAR's prior arrest.
- 46) Lauren Barrett, current contact information unknown, this individual may have knowledge relating to LUMAR's prior arrest.
- 47) Amritpal Jawanda, MD, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

- 48) Sukhveer Wahi, MD, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 49) Dexter Reed, security, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 50) Katie Simmons, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 51) Maria Vega, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 52) Monique Zkson, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 53) Erica Cook, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.
- 54) Erik Spann, last known address 426 North Harding Avenue in Chicago, Illinois. This individual may have knowledge regarding LUMAR's suicide attempt, statements, and actions taken immediately after LUMAR's suicide attempt.

55) Civilian Office of Police Accountability (“COPA”) Investigator Bruce Dean, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

56) COPA Investigator Chantelle Hill, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

57) COPA Investigator William Abbruzzese, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

58) COPA Investigator Joshua Hunt this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

59) COPA Investigator Catherina Oliveri, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

60) COPA Investigator Kelvin Lett, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that

are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

61) COPA Investigator Linda Franco, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

62) COPA Investigator Adam Pfeifer, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

63) COPA Investigator Daniel Kobel, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

64) COPA Investigator S. Carter, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

65) Chicago Police Chief Wayne M. Gulliford, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the Chicago Police Department policy as to holding arrestees detained on arrest warrants issued outside of Cook County.

66) Amar Singh, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

67) Laila Robateau, RN, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

68) Amir Vafa, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

69) Jonathan Hwee, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

70) Alan Matson, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

71) Ivica Vucic, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

72) Amar Shah, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

73) Jeffrey Yu, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

74) Adarsh Shukla, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

75) Christine Eden, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

76) Anthony Castelli, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

77) Laura Kozak, RN, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

78) Sandeep Khosla, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

79) Mir Yadullahi, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

- 80) Andrew Bokarius, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 81) Mark Chottiner, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 82) Valeria Cooper, PA, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 83) Stavros Maltezos, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 84) Keenan Wanamaker, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 85) Alin Cheran MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 86) Nancy Sibigtroth, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

- 87) Kukoyi Omobolawa, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 88) William Brigode, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 89) Sarah Bacje Wiig, PA, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 90) Albert Leung, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 91) Taral Doshi, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 92) Gary Merlott, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.
- 93) Michael Rechitsky, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

94) Ryan Sullivan, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

95) Steven Flynn, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

96) Alan Hecht, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

97) David DeBruin, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

98) Richard Kim, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

99) Kevin Frame, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

100) Sarah Rowe, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

101) Anthony Thomas, MD, c/o Quest Diagnostics Wood Dale, 1355 Mittel Boulevard, Wooddale, IL. This individual may be contacted through Quest Diagnostics.

This individual may have knowledge regarding medical testing performed on LUMAR following LUMAR's suicide attempt.

- 102) Erika Ferguson, MD c/o Mt. Sinai Hospital in Chicago, Illinois, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment prior to LUMAR's suicide attempt.
- 103) Chief Judge Timothy C. Evans, Circuit Court of Cook County, to be contacted through legal department of the Circuit Court of Cook County. Judge Evans may have knowledge regarding his order stating that all individuals arrested by the Chicago Police Department on an arrest warrant issued by an Illinois state court outside of Cook County shall be required to appear in bond court prior to release.
- 104) Representative from Circuit Court of Lee County, to be contacted through legal department of Circuit Court of Lee County. This individual may have knowledge regarding the issuance of LUMAR's Lee County arrest warrant and would be expected to testify that on August 18, 2016, LUMAR's Lee County arrest warrant was valid.
- 105) Representative from the Office of Emergency Management and Communication ("OEMC"), this individual may be contacted through counsel for Defendant City of Chicago only. This individual would have knowledge regarding OEMC documents and recordings and would lay foundation for OEMC documents and/or OEMC recordings.
- 106) Personnel from the Chicago Police Department, to lay foundation for and/or to testify all Chicago Police Department records produced in this case, including, but not limited to, police reports, photographs, relevant individuals' criminal backgrounds, rap sheets, to be contacted through defense counsel.

- 107) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to official Chicago Police Department policy on specific subjects, including but not limited to General Orders and Special Orders of the Chicago Police Department.
- 108) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to training provided to City of Chicago employees.
- 109) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to investigations into in-custody deaths of arrestees.
- 110) Representative(s) from the City of Chicago, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to investigations into allegations involving misconduct on the part of City of Chicago Police Department employees.

Investigation continues and this response is not intended to be a final list of possible witnesses in this matter. Defendants reserve the right to supplement this response as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project. Defendants also reserve the right to call any witnesses disclosed by Plaintiff at trial in this matter.

2. State the names and, if known, the addresses and telephone numbers of all persons who you believe have given written or recorded statements relevant to any party's claims or defenses. Unless you assert a privilege or work product protection against disclosure under applicable law, attach a copy of each such statement if it is in your possession, custody, or control. If not in your possession, custody, or control, state the name and, if known, the address and telephone number of each person who you believe has custody of a copy.

RESPONSE:

At this time, numerous witnesses have given statements relevant to any party's claims or defenses. Copies of the statements are being provided to Plaintiff and are contained within the Log File.

Investigation continues and this response is not intended to be a final list of people who have given written or recorded statements relevant to any party's claims or defenses. Defendants reserve the right to supplement this response as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project. Defendants also reserve the right to call any witnesses disclosed by Plaintiff at trial in this matter.

3. List the documents, electronically stored information ("ESI"), tangible things, land, or other property known by you to exist, whether or not in your possession, custody or control, that you believe may be relevant to any party's claims or defenses. To the extent the volume of any such materials makes listing them individually impracticable, you may group similar documents or ESI into categories and describe the specific categories with particularity. Include in your response the names and, if known, the addresses and telephone numbers of the custodians of the documents, ESI, or tangible things, land, or other property that are not in your possession, custody, or control. For documents and tangible things in your possession, custody, or control, you may produce them with your response, or make them available for inspection on the date of the response, instead of listing them. Production of ESI will occur in accordance with paragraph C.2 below.

RESPONSE:

Defendants refer to the following documents identified herein, which are being produced November 17, 2017:

File Name	Production Begin	Production End
00.pdf	FCRL 000001	FCRL 000004
1.pdf	FCRL 000005	FCRL 000006
10.pdf	FCRL 000007	FCRL 000008
11.pdf	FCRL 000009	FCRL 000018
12.pdf	FCRL 000019	FCRL 000020
13.mp3	FCRL 000021	FCRL 000021
13750299 ChainOC.pdf	FCRL 000022	FCRL 000022
14.mp3	FCRL 000023	FCRL 000023
15 min Inspection log (2016, 09-07) Preservation _ Lumar.pdf	FCRL 000024	FCRL 000030
15.mp3	FCRL 000031	FCRL 000031
16.mp3	FCRL 000032	FCRL 000032
17.pdf	FCRL 000033	FCRL 000033
18.pdf	FCRL 000034	FCRL 000034
19.pdf	FCRL 000035	FCRL 000035
2.pdf	FCRL 000036	FCRL 000036
20.pdf	FCRL 000037	FCRL 000038
21.pdf	FCRL 000039	FCRL 000044
22.pdf	FCRL 000045	FCRL 000045
23.pdf	FCRL 000046	FCRL 000048
24.pdf	FCRL 000049	FCRL 000066
25.pdf	FCRL 000067	FCRL 000067
26.pdf	FCRL 000068	FCRL 000071
27.pdf	FCRL 000072	FCRL 000072
28.pdf	FCRL 000073	FCRL 000076
29.pdf	FCRL 000077	FCRL 000079
3.pdf	FCRL 000080	FCRL 000080
30.pdf	FCRL 000081	FCRL 000082
31.pdf	FCRL 000083	FCRL 000405
32.pdf	FCRL 000406	FCRL 000409
33.pdf	FCRL 000410	FCRL 000410
34.pdf	FCRL 000411	FCRL 000411
35.wav	FCRL 000412	FCRL 000412
36.pdf	FCRL 000413	FCRL 000413

37.pdf	FCRL 000414	FCRL 000415
38.pdf	FCRL 000416	FCRL 000416
39.pdf	FCRL 000417	FCRL 000417
4.pdf	FCRL 000418	FCRL 000422
40.pdf	FCRL 000423	FCRL 000423
5.pdf	FCRL 000424	FCRL 000426
6.pdf	FCRL 000427	FCRL 000428
602 Reports (2016, 09-07) Fire _ Preservation _ Lumar.pdf	FCRL 000429	FCRL 000431
7.pdf	FCRL 000432	FCRL 000433
8.pdf	FCRL 000434	FCRL 000434
9.pdf	FCRL 000435	FCRL 000437
90930001.jpg	FCRL 000438	FCRL 000438
90930002.jpg	FCRL 000439	FCRL 000439
90930003.jpg	FCRL 000440	FCRL 000440
90930004.jpg	FCRL 000441	FCRL 000441
90930005.jpg	FCRL 000442	FCRL 000442
90930006.jpg	FCRL 000443	FCRL 000443
90930007.jpg	FCRL 000444	FCRL 000444
90930008.jpg	FCRL 000445	FCRL 000445
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90930011.jpg	FCRL 000448	FCRL 000448
90930012.jpg	FCRL 000449	FCRL 000449
90930013.jpg	FCRL 000450	FCRL 000450
90930014.jpg	FCRL 000451	FCRL 000451
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90930016.jpg	FCRL 000453	FCRL 000453
90930017.jpg	FCRL 000454	FCRL 000454
90930018.jpg	FCRL 000455	FCRL 000455
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90930026.jpg	FCRL 000463	FCRL 000463
90930027.jpg	FCRL 000464	FCRL 000464
90930028.jpg	FCRL 000465	FCRL 000465
90930029.jpg	FCRL 000466	FCRL 000466

90930030.jpg	FCRL 000467	FCRL 000467
90930031.jpg	FCRL 000468	FCRL 000468
90930032.jpg	FCRL 000469	FCRL 000469
90930033.jpg	FCRL 000470	FCRL 000470
90930034.jpg	FCRL 000471	FCRL 000471
90930035.jpg	FCRL 000472	FCRL 000472
90930036.jpg	FCRL 000473	FCRL 000473
90930037.jpg	FCRL 000474	FCRL 000474
90930038.jpg	FCRL 000475	FCRL 000475
90930039.jpg	FCRL 000476	FCRL 000476
90930040.jpg	FCRL 000477	FCRL 000477
90930041.jpg	FCRL 000478	FCRL 000478
90930042.jpg	FCRL 000479	FCRL 000479
90930043.jpg	FCRL 000480	FCRL 000480
90930044.jpg	FCRL 000481	FCRL 000481
90930045.jpg	FCRL 000482	FCRL 000482
90930046.jpg	FCRL 000483	FCRL 000483
90930047.jpg	FCRL 000484	FCRL 000484
90930048.jpg	FCRL 000485	FCRL 000485
90930049.jpg	FCRL 000486	FCRL 000486
90930050.jpg	FCRL 000487	FCRL 000487
90930051.jpg	FCRL 000488	FCRL 000488
90930052.jpg	FCRL 000489	FCRL 000489
A&A sheet identifying P.O. from Arrestee Transport Manifest.pdf	FCRL 000490	FCRL 000490
A&A Sheets (2016, 09-14) 2016, 08-18_Preservation_Lumar.pdf	FCRL 000491	FCRL 000521
A&A Sheets (2016, 09-14) 2016, 08-19_Preservation_Lumar.pdf	FCRL 000522	FCRL 000552
Ambulance Report - LUMAR TYLER (2016, 08-29).pdf	FCRL 000553	FCRL 000558
Area File (2016 10-25) RD# HZ398499.pdf	FCRL 000559	FCRL 000570
Arrest Report (2016, 08-22) Preservation_2016, 08-19.pdf	FCRL 000571	FCRL 000575
Arrest Report (2016, 10-25) Spann Alcorn.pdf	FCRL 000576	FCRL 000580
arrest report previous-08302016.pdf	FCRL 000581	FCRL 000585
arrest report searchpreservation-08302016.pdf	FCRL 000586	FCRL 000589
Arrestee Property Log (2016, 10-28) Alcorn.pdf	FCRL 000590	FCRL 000590

Audio Research log (2016, 09-07) Fire Preservation Lumar.pdf	FCRL 000591	FCRL 000591
Audio Research Log ADDITIONAL.pdf	FCRL 000592	FCRL 000592
Audio Research Log ADDITIONAL.pdf	FCRL 000593	FCRL 000593
Audio Research Log.pdf	FCRL 000594	FCRL 000594
Audio Research Log.pdf	FCRL 000595	FCRL 000595
Audio Research Logs (2016, 12-13) 2016, 08-18_Alcorn.pdf	FCRL 000596	FCRL 000597
Audio Research Logs (2016, 12-13) 2016, 08-19_Alcorn.pdf	FCRL 000598	FCRL 000599
BEAT 1113A.pdf	FCRL 000600	FCRL 000604
BEAT-1101.pdf	FCRL 000605	FCRL 000609
BEAT-1112A.pdf	FCRL 000610	FCRL 000613
BEAT-1123.pdf	FCRL 000614	FCRL 000631
BEAT-1124.pdf	FCRL 000632	FCRL 000643
BEAT-1130.pdf	FCRL 000644	FCRL 000647
BEAT-1134.pdf	FCRL 000648	FCRL 000668
BEAT-5832.pdf	FCRL 000669	FCRL 000673
Booking photo (2016, 08-29).pdf	FCRL 000674	FCRL 000675
Booking Photos (2016, 08-29) Previous Arrest.pdf	FCRL 000676	FCRL 000677
Case Report (2016, 10-19) RD H2 398804_Alcorn.pdf	FCRL 000678	FCRL 000679
Chain of Custody Report (2016-09-26).pdf	FCRL 000680	FCRL 000690
Criminal History (2016, 08-22) Preservation_2016, 08-19.pdf	FCRL 000691	FCRL 000695
Criminal History (2016, 10-25) Span_Alcorn.pdf	FCRL 000696	FCRL 000698
cw1 radio 1508 hrs.mp3	FCRL 000699	FCRL 000699
cw1 radio 1508 hrs.txt	FCRL 000700	FCRL 000700
cw2 phone position pdt103 1300 to 1736 hrs.mp3	FCRL 000701	FCRL 000701
cw2 phone position pdt103 1300 to 1736 hrs.txt	FCRL 000702	FCRL 000703
cw2 radio 1300 to 1356 hrs.mp3	FCRL 000704	FCRL 000704
cw2 radio 1300 to 1356 hrs.txt	FCRL 000705	FCRL 000744
cw2 radio 1356 to 1500 hrs.txt	FCRL 000745	FCRL 000764
cw2 radio 1356 to 1500hrs.mp3	FCRL 000765	FCRL 000765
cw2 radio 1459 to 1553 hrs.mp3	FCRL 000766	FCRL 000766
cw2 radio 1459 to 1553 hrs.txt	FCRL 000767	FCRL 000787
cw2 radio 1508 hrs.txt	FCRL 000788	FCRL 000788
cw2 radio 1553 to 1736 hrs.mp3	FCRL 000789	FCRL 000789

cw2 radio 1553 to 1736 hrs.txt	FCRL 000790	FCRL 000841
cw4 radio 1508 hrs.txt	FCRL 000842	FCRL 000842
EMS North Radio 1110hrs to 1259hrs.mp3	FCRL 000843	FCRL 000843
EMS North Radio 1110hrs to 1259hrs.txt	FCRL 000844	FCRL 000882
ev 05380-111658 to 121701hrs.txt	FCRL 000883	FCRL 001008
ev 05380-121656 to 131532hrs.mp3	FCRL 001009	FCRL 001009
ev 05380-121656 to 131532hrs.txt	FCRL 001010	FCRL 001113
ev 05380-131530 to 151659hrs.mp3	FCRL 001114	FCRL 001114
ev 09530.txt	FCRL 001115	FCRL 001115
ev 09534.txt	FCRL 001116	FCRL 001116
Event Queries (2016, 12-13) 2016, 08-18_Aicorn.pdf	FCRL 001117	FCRL 001119
Event Queries (2016, 12-13) 2016, 08-19_Aicorn.pdf	FCRL 001120	FCRL 001126
Event Query (2016, 09-07) Fire _ Preservation _ Lumar.pdf	FCRL 001127	FCRL 001129
EventQuery -1623205380.pdf	FCRL 001130	FCRL 001134
EventQuery-1623206198.pdf	FCRL 001135	FCRL 001136
EventQuery-1623207170.pdf	FCRL 001137	FCRL 001139
Fingerprints (2016, 09-29).pdf	FCRL 001140	FCRL 001143
FIRE North Radio 1110hrs to 1204hrs.mp3	FCRL 001144	FCRL 001144
FIRE North Radio 1110hrs to 1204hrs.txt	FCRL 001145	FCRL 001172
Forensics (2016, 10-03).pdf	FCRL 001173	FCRL 001176
GPS-BEAT 1123-3151 W. HARRISON.xls	FCRL 001177	FCRL 001186
GPS-BEAT 1124-3151 W. HARRISON.xls	FCRL 001187	FCRL 001192
GPS-BEAT 1124-3959 W. MADISON.xls	FCRL 001193	FCRL 001196
GPS-BEAT 1130-3151 W. HARRISON.xls	FCRL 001197	FCRL 001202
GPS-BEAT 1134-3151 W. HARRISON.xls	FCRL 001203	FCRL 001214
GPS-BEAT 5832-3151 W. HARRISON.xls	FCRL 001215	FCRL 001218
In car video (2016, 09-06)preservation.pdf	FCRL 001219	FCRL 001220
Inventory 13750250 (2016, 10-31) Aicorn.pdf	FCRL 001221	FCRL 001222
Inventory Search (2016, 08-30) RD HZ397430 Preservation.pdf	FCRL 001223	FCRL 001223

LUMAR Arrestee Property Transport Manifest (2016, 10-27).pdf	FCRL 001224	FCRL 001225
Male Lockup.pdf	FCRL 001226	FCRL 001227
MAP-BEAT 1123 - 3151 W. HARRISON.pdf	FCRL 001228	FCRL 001230
MAP-BEAT 1124 - 3151 W. HARRISON.pdf	FCRL 001231	FCRL 001232
MAP-BEAT 1124-3959 W. MADISON.pdf	FCRL 001233	FCRL 001235
MAP-BEAT 1130 - 3151 W. HARRISON.pdf	FCRL 001236	FCRL 001238
MAP-BEAT 1134 - 3151 W. HARRISON.pdf	FCRL 001239	FCRL 001241
MAP-BEAT 5832 - 3151 W. HARRISON.pdf	FCRL 001242	FCRL 001243
mdt_messages_LH16721_A33-1357.pdf	FCRL 001244	FCRL 001244
mdt_messages_LH16721_E107-1298.pdf	FCRL 001245	FCRL 001246
Memo regarding Arrest Warrants.pdf	FCRL 001247	FCRL 001247
Motion for Preservation-Emergency (2016-08-26).pdf	FCRL 001248	FCRL 001251
notifications 1215 to 1300 hrs.mp3	FCRL 001252	FCRL 001252
notiflcations 1215 to 1300 hrs.txt	FCRL 001253	FCRL 001254
OCIR2-REDACTED.pdf	FCRL 001255	FCRL 001256
OCIR3-REDACTED.pdf	FCRL 001257	FCRL 001258
OCIR-REDACTED.pdf	FCRL 001259	FCRL 001261
OEMC CD's (2016, 12-13) Alcorn.pdf	FCRL 001262	FCRL 001265
PC Search Report (2016, 10-24).pdf	FCRL 001266	FCRL 001270
PC0AZ95@20160818150632.mpg	FCRL 001271	FCRL 001271
PDT & MDT (2016, 09-13).doc	FCRL 001272	FCRL 001272
PDT_Beat_ID_LH16721.PDF	FCRL 001273	FCRL 001273
PDT_Messages_LH16721_1123.PDF	FCRL 001274	FCRL 001275
pdtd_messages_LH16721_1124-2726.pdf	FCRL 001276	FCRL 001285
pdtd_messages_LH16721_1130-2754.pdf	FCRL 001286	FCRL 001287
pdtd_messages_LH16721_1134-2775.pdf	FCRL 001288	FCRL 001300
Preservation Letter (2016, 09-07) EO_Tyler Lumar.pdf	FCRL 001301	FCRL 001303
Prisoner transportation Transmittal (2016, 10-20) Alcorn.pdf	FCRL 001304	FCRL 001304
Property Transmittal Report (2016, 10-28) Alcorn.pdf	FCRL 001305	FCRL 001314

Ref. CFD16-0481 Audio Log.pdf	FCRL 001315	FCRL 001315
Special Order (2017, 11-01) S06-01-02.pdf	FCRL 001316	FCRL 001321
Station Video (2017, 09-01) Dist 011.pdf	FCRL 001322	FCRL 001322
Supervisor Management Log (2017, 09-01).pdf	FCRL 001323	FCRL 001346
tempD.xml	FCRL 001347	FCRL 001348
tempV.xml	FCRL 001349	FCRL 001355
Unit Queries (2016, 12-13) 2016, 08-18_Alcorn.pdf	FCRL 001356	FCRL 001366
Watch Incident Log (2017, 09-01).pdf	FCRL 001367	FCRL 001372
z10 phone position pd119 1016 to 2155 hrs.mp3	FCRL 001373	FCRL 001373
z10 phone position pd119 1016 to 2155 hrs.txt	FCRL 001374	FCRL 001381
z10 phone position pd119 1405 to 2007 hrs.mp3	FCRL 001382	FCRL 001382
z10 phone position pd119 1405 to 2007 hrs.txt	FCRL 001383	FCRL 001383
z10 phone position pd120 1016 to 2155 hrs.mp3	FCRL 001384	FCRL 001384
z10 phone position pd120 1016 to 2155 hrs.txt	FCRL 001385	FCRL 001386
z10 phone position pd120 1405 to 2007 hrs.mp3	FCRL 001387	FCRL 001387
z10 phone position pd120 1405 to 2007 hrs.txt	FCRL 001388	FCRL 001390
z10 radio 1016 to 1117 hrs.mp3	FCRL 001391	FCRL 001391
z10 radio 1016 to 1117 hrs.txt	FCRL 001392	FCRL 001479
z10 radio 1405 to 1508 hrs.mp3	FCRL 001480	FCRL 001480
z10 radio 1405 to 1508 hrs.txt	FCRL 001481	FCRL 001541
z10 radio 1516 to 1616 hrs.mp3	FCRL 001542	FCRL 001542
z10 radio 1516 to 1616 hrs.txt	FCRL 001543	FCRL 001631
z10 radio 1607 to 1705 hrs.mp3	FCRL 001632	FCRL 001632
z10 radio 1607 to 1705 hrs.txt	FCRL 001633	FCRL 001712
z10 radio 1616 to 1717 hrs.mp3	FCRL 001713	FCRL 001713
z10 radio 1616 to 1717 hrs.txt	FCRL 001714	FCRL 001819
z10 radio 1705 to 1807 hrs.mp3	FCRL 001820	FCRL 001820
z10 radio 1705 to 1807 hrs.txt	FCRL 001821	FCRL 001901
z10 radio 1716 to 1816 hrs.mp3	FCRL 001902	FCRL 001902
z10 radio 1716 to 1816 hrs.txt	FCRL 001903	FCRL 001999
z10 radio 1806 to 1907 hrs.mp3	FCRL 002000	FCRL 002000
z10 radio 1806 to 1907 hrs.txt	FCRL 002001	FCRL 002072

z10 radio 1816 to 1916 hrs.mp3	FCRL 002073	FCRL 002073
z10 radio 1816 to 1916 hrs.txt	FCRL 002074	FCRL 002158
z10 radio 1906 to 2007 hrs.mp3	FCRL 002159	FCRL 002159
z10 radio 1906 to 2007 hrs.txt	FCRL 002160	FCRL 002264
z10 radio 1916 to 2055 hrs.mp3	FCRL 002265	FCRL 002265
z10 radio 1916 to 2055 hrs.txt	FCRL 002266	FCRL 002456
z10 radio 2054 to 2154 hrs.mp3	FCRL 002457	FCRL 002457
z10 radio 2054 to 2154 hrs.txt	FCRL 002458	FCRL 002577
zone 10-150822 to 160757hrs.txt	FCRL 002578	FCRL 002664

This disclosure is not intended to be a final list of possible documents to be used in this matter. Defendants reserves the right to supplement this disclosure as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project.

4. For each of your claims or defenses, state the facts relevant to it and the legal theories upon which it is based.

RESPONSE:

- I. Plaintiff has failed to state a claim upon which relief may be granted against Defendant City under Federal Rule of Civil Procedure 12(b)(6). The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- II. The Chicago Police Department is a non-suable entity. The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- III. The City of Chicago is immune from the imposition of punitive damages under both state and federal law. Moreover, under Illinois law, the City cannot be required to indemnify an employee for punitive damages, nor may it pay a judgment for punitive damages. 745 ILCS 10/2-102 (2014); *City of Newport v. Facts Concerts*, 453 U.S. 247, 271 (1981).

- IV. The City of Chicago cannot be held liable under 42 U.S.C. § 1983 on a *respondeat superior* theory. The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- V. The City of Chicago is immune from liability for alleged constitutional deprivations caused unless Plaintiff can show that an individual defendant employed by the City of Chicago caused Plaintiff to suffer a constitutional injury. *City of Los Angeles v. Heller*, 475 U.S. 796, 799 (1986) (holding no *Monell* liability where no individual defendant is liable for underlying substantive claim); *Durkin v. City of Chicago*, 341 F.3d 606, 615 (7th Cir. 2003) (same). The factual basis for this defense is that Tyler Lumar attempted to commit suicide without any City of Chicago employee being put on actual notice that Tyler Lumar was at risk of suicide or self-harm. Absent this notice, no City of Chicago employee can be liable under 42 U.S.C. § 1983. *See, e.g. Saucedo v. City of Chicago*, No. 11 C 5868, 2015 WL 3643417 (N.D.Ill. June 11, 2015) (Zagel, J.). The factual basis and legal theory are also included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- VI. To the extent that Tyler Lumar failed to mitigate any of his claimed injuries or damages, any verdict or judgment obtained by Plaintiff must be reduced by application of the principle that Tyler Lumar had a duty to mitigate, commensurate with the degree of failure to mitigate attributed to Tyler Lumar by the jury in this case. The factual basis for this defense is that Tyler Lumar failed to mitigate his potential damages relating to the arrest on an outstanding warrant by, according to the Cook County Sheriff's Department, being in possession of illegal narcotics, which thereby extended the time he was in custody.
- VII. To the extent any injuries or damages claimed by Plaintiff as proximately caused, in whole or in part, by the negligent, willful and wanton and/or other wrongful conduct on the part of the Tyler Lumar, any verdict or judgment obtained by Plaintiff must be reduced by application of the principles of comparative fault, by an amount commensurate with the degree of fault attributed to Tyler Lumar by the jury in this cause. The factual basis for this defense is that Tyler Lumar voluntarily attempted to commit suicide, an act which directly and entirely caused his physical damages.

- VIII. At all times relevant to Plaintiff's Complaint, Defendants were government officials, namely police officers, who were performing discretionary functions. At all times material to the events alleged in Plaintiff's Complaint, a reasonable police officer objectively viewing the facts and circumstances that confronted said Defendants could have believed his or her actions to be lawful, in light of clearly established law and the information that Defendants possessed. Defendants, therefore, are entitled to qualified immunity as a matter of law.
- IX. The Defendants cannot be held liable for Plaintiff's 42 U.S.C. § 1983 claims unless each individually caused or participated in the alleged constitutional deprivation because individual liability for damages under 42 U.S.C. § 1983 is predicated upon personal responsibility. See *Wolf-Lillie v. Sonquist*, 699 F.2d 864, 869 (7th Cir. 1983).
- X. Any award of damages against the individual Defendants shall be reduced in proportion to the comparative fault of Plaintiff's own acts or omissions, including but not limited to his own willful and wanton conduct which proximately caused the claimed injuries and damages. In addition, at the time of the actions alleged in Plaintiff's Complaint, 735 ILCS 5/2-1116 (2015) was in effect. This statute reduces a plaintiff's recovery according to his contributory negligence and bars his recovery entirely when a plaintiff is more than fifty percent (50%) of the proximate cause of the injury or damage for which recovery is sought.

5. Provide a computation of each category of damages claimed by you, and a description of the documents or other evidentiary material on which it is based, including materials bearing on the nature and extent of the injuries suffered. You may produce the documents or other evidentiary materials with your response instead of describing them.

RESPONSE:

Not applicable to Defendants.

6. Specifically identify and describe any insurance or other agreement under which an insurance business or other person or entity may be liable to satisfy all or part of a possible

judgment in the action or to indemnify or reimburse a party for payments made by the party to satisfy the judgment. You may produce a copy of the agreement with your response instead of describing it.

RESPONSE:

On August 19, 2016 date, the City of Chicago was self-insured for settlements and judgments up to and including \$20 million per occurrence. For settlements or judgments covered by the City's excess liability policy in excess of \$20 million, the City has the following coverage up to \$55 million:

Argo Re Limited
\$5,000,000 per occurrence/aggregate, where applicable

Allied World Assurance Company, Ltd.
\$5,000,000 per occurrence/\$10,000,000 aggregate

Argo Re Limited
\$10,000,000 per occurrence/aggregate

Westchester Surplus Lines Insurance Company
\$15,000,000 per occurrence/aggregate, where applicable

Argo Re Limited and Allied World Assurance Company, Ltd (quote share)
\$15,000,000 per occurrence/\$15,000,000 aggregate

First Specialty Insurance Corporation
\$5,000,000 per occurrence/aggregate, where applicable

Dated: November 17, 2017.

Respectfully submitted,

/s/ Jason Marx
Jason Marx
Assistant Corporation Counsel

Caroline Fronczak
Jessica Gomez-Feie
Attorneys for Defendants
City of Chicago, Department of Law
30 N. LaSalle Street, Suite 900
Chicago, Illinois 60602

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of **DEFENDANTS' RESPONSE TO MANDATORY INITIAL DISCOVERY**, to be delivered via email and via U.S. mail to the parties named below at the addresses shown this 17th day of November 2017.

Eileen M. O'Connor
O'Connor Law Group LLC
140 S. Dearborn, Suite 320
Chicago, IL 60603

Kevin Kocim
Assistant State's Attorney
Civil Rights Section
Cook County State's Attorney's Office
500 Daley Center
Chicago, Illinois 60602

Devlin Schoop, Senior Counsel
Shawn Barnett, Assistant Corporation Counsel
Allison Romelfanger, Assistant Corporation Counsel
City of Chicago, Department of Law
30 N. LaSalle Street, Suite 900
Chicago, Illinois 60602

/s/ Jason Marx
JASON MARX

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, et al.,)	
)	CASE NO. 17 C 5859
Plaintiff,)	
)	JUDGE KENDALL
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Charles Barry, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 16, 2017.

Signature:


CHARLES BARRY

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Kevin Geyer, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of 15 NOVEMBER 2017.

Signature:

 #1679
KEVIN GEYER

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian
of the Estate of Tyler Lumar

Plaintiff

v.

The City of Chicago, et al.

Defendants.

Case No. 17 C 5859

Judge Kendall

Magistrate Judge Finnegan

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Alan Lasch, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of 10 NOVEMBER 2017.

Signature:



ALAN LASCH

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, et al.,

Plaintiff,

CITY OF CHICAGO, et al.

Defendants.

)
)
)
)
)
)
)

CASE NO. 17 C 5859

JUDGE KENDALL

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Corrina Esteban, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 17, 2017.

Signature:

Corrina Esteban by Jessica Amy Jau
CORRINA ESTEBAN with consent

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian
of the Estate of Tyler Lumar

Plaintiff

v.

The City of Chicago, et al.

Defendants.

)
)
) Case No. 17 C 5859

) Judge Kendall

) Magistrate Judge Finnegan
)
)

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, John Gartner, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago, and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of 10 NOV 2017.

Signature:

 #2523
JOHN GARTNER

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian of the Estate of Tyler Lumar)	
)	
Plaintiff)	Case No. 17 C 5859
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Dany Helwink Masters, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of NOV 12 2017.

Signature:


DANY HELWINK MASTERS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, et al.,)	
)	CASE NO. 17 C 5859
Plaintiff,)	
)	JUDGE KENDALL
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Peter Vinson, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 17, 2017.

Signature: _____


PETER VINSON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, et al.,)	
)	CASE NO. 17 C 5859
Plaintiff,)	
)	JUDGE KENDALL
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Dietrice Alexander, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 17, 2017.

Signature:


DIETRICE ALEXANDER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LISA ALCORN, et al.,

Plaintiff,

CITY OF CHICAGO, et al.

Defendants.

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)
)
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CASE NO. 17 C 5859

JUDGE KENDALL

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Carlos Vega, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 17, 2017.

Signature:


CARLOS VEGA

17 NOV 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Aleorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

CERTIFICATION OF DEFENDANTS' RESPONSES
TO MANDATORY INITIAL DISCOVERY

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Weslene O'Donnell, certify that the foregoing Defendants' Responses to Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of 11 NOV 2017.

Signature:

Weslene O'Donnell
WESLENE O'DONNELL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

Notice of Service

To: All counsel of record

Pursuant to the Mandatory Initial Discovery Pilot Program standing order, Defendant City of Chicago is filing this Notice of Service using the Court's electronic filing system to document that Defendant City of Chicago's Responses to Mandatory Initial Discovery has been served upon all counsel of record in this matter on the date of this filing.

Dated: November 17, 2017

Respectfully submitted,

/s/ Shawn W. Barnett
Attorney No. 6312312

Devlin Schoop, Senior Counsel
Shawn W. Barnett, Assistant Corporation Counsel
Allison Romelfanger, Assistant Corporation Counsel
City of Chicago Department of Law
30 N. LaSalle, Suite 900
Chicago, IL 60602
(312) 744-0742

Certificate of Service

I, the undersigned attorney, certify that I filed this document using the Court's electronic filing system. As a result, electronic copies of the filed document were served upon all counsel of record. Additionally, a copy of the filed document may have been provided to the Court depending upon the Court's standing order.

/s/ Shawn W. Barnett

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

DEFENDANT CITY OF CHICAGO'S
RESPONSES TO MANDATORY INITIAL DISCOVERY

Defendant, City of Chicago ("City"), through its counsel, Edward N. Siskel, Corporation Counsel for the City of Chicago, for its responses to Mandatory Initial Discovery Requests pursuant to the Standing Order Regarding Mandatory Initial Discovery Pilot Project, states as follows:

1. State the names and, if known, the addresses and telephone numbers of all persons who you believe are likely to have discoverable information relevant to any party's claims or defenses, and provide a fair description of the nature of the information each such person is believed to possess.

RESPONSE:

1) Defendant Daniel Warren, Star No. 17444, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including, but not limited to, the arrest of Tyler Lumar ("LUMAR"), the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of

the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

2) Defendant Carlos Vega, Star No. 17477, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

3) Defendant Corrina Esteban, Star No. 17617, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through her counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

4) Defendant Justin Conner, Star No. 18863, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

5) Defendant Danny Helwink-Masters, Star No. 261, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through her counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

6) Defendant James Jones, Star No. 73, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

7) Defendant Alexander Star No. 7662, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through her counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

8) Defendant Vinson Star No. 17066, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of

LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

9) Defendant Alan Lasch, Star No. 1434, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

10) Defendant Kevin Geyer, Star No. 1679, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through her counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

11) Defendant Weselene O'Donnell, Star No. 2167, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through her counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the

City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

12) Defendant Sgt. John Gartner, Star No. 2523, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

13) Defendant Charles Barry, Star No. 49970, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

14) Defendant Kimoni Peals, 3510 S. Michigan Ave., Chicago, Illinois, may be contacted through his counsel only. This individual may have knowledge or information regarding the incident that is the subject of this lawsuit, including but not limited to the arrest of LUMAR, the arrest warrant issued by Lee County, their observations and contact with LUMAR, any reports they authored or assisted with authoring, their understanding and memory of the training provided by the City of Chicago, their experience as an employee of the City of Chicago, and, possibly, financial information relevant to damages should such information become relevant for their defense.

15) Plaintiff Lisa Alcorn, who shall be contacted through her counsel of record. This individual may have knowledge regarding the allegations contained in the Complaint, any alleged damages she claims that Tyler Lumar suffered in connection with the events that are the subject of this lawsuit, as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants, including LUMAR's criminal history and convictions, if any.

16) Defendant T. Wlodarski, Cook County Sheriff's Office. This individual may be contacted through his counsel only. This individual may have knowledge of the events that are the subject of this lawsuit as well as all other subject matter set out in documents produced in discovery by Plaintiff and Defendants.

17) Cook County Sheriff's Department Lieutenant A. Lewis, this individual may be contacted through the legal department for the Cook County Sheriff's Department. This individual may have knowledge regarding LUMAR's alleged possession of narcotics during the processing in the bullpen area at or near the location of the criminal courthouse.

18) Chicago Police Detective Marc Leavitt, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including any findings, observations, statements made, evidence recovered, and relevant reports or other documents created following LUMAR's suicide attempt.

19) Chicago Police Detective William Fiedler, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including any findings, observations, statements made, evidence recovered, and relevant reports or other documents created following LUMAR's suicide attempt.

20) Chicago Police Officer Daniel McCall, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including any findings, observations, statements made, evidence recovered, and relevant reports or other documents created following LUMAR's suicide attempt.

21) Chicago Police Officer Greg Roszkowski, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including any findings, observations, statements made, evidence recovered, and relevant reports or other documents created following LUMAR's suicide attempt.

22) Chicago Police Department employee Jonathan Errum, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding LUMAR's suicide attempt, including but not limited to their actions and observations following LUMAR's suicide attempt and statements made at that time.

23) Chicago Police Officer Brigid Menoni, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding LUMAR's suicide attempt, including but not limited to their actions and observations following LUMAR's suicide attempt and statements made at that time.

24) Chicago Police Officer John Granat, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge or information regarding LUMAR's time in custody of the Chicago Police Department, LUMAR's suicide attempt, including but not limited to their actions and observations following LUMAR's suicide attempt and statements made at that time.

25) Oak Park Police Officer R. Zsiebida, Star 417, this individual may be contacted through the legal department of the Oak Park Police Department. This individual may have knowledge of LUMAR's prior arrest and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

26) Oak Park Officer M. Scott, Star 342, this individual may be contacted through the legal department of the Oak Park Police Department. This individual may have knowledge of LUMAR's prior arrest and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

27) Chicago Police Officer Thomas Gannon, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge of LUMAR's arrest for narcotics possession on August 19, 2016 and all other subject matter set out in related documents produced in discovery by Plaintiff and Defendants.

28) Chicago Police Evidence Technician Angelo Marconi, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding recovery of evidence following LUMAR's suicide attempt and relevant documents of the evidence recovery and scene processing.

29) Chicago Police Evidence Technician Elizabeth Vera, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding recovery of evidence following LUMAR's suicide attempt and relevant documents of the evidence recovery and scene processing.

30) Chicago Police Sergeant Thomas Mitchell, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.

31) Chicago Police Sergeant Erik Madsen, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.

32) Chicago Police Officer Michael Bertini, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.

33) Chicago Police Officer Patrick Cradick, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.

34) Chicago Police Officer Roger Bay, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the scene of LUMAR's suicide attempt and investigation into the suicide attempt.

35) Chicago Police Officer Walter Delgado, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

36) Chicago Police Officer Kevin Wortham, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

37) Chicago Police Department employee A. McGuire, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge

regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

38) Chicago Police Department employee R. Kincaid, this individual may be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding LUMAR's physical and mental condition prior to LUMAR's suicide attempt on August 19, 2016.

39) Chicago Fire Department paramedic Luis Velez, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

40) Chicago Fire Department paramedic Tristan Lopez, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

41) Chicago Fire Department Lieutenant Marlon Woods, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

42) Chicago Fire Department firefighter Wade, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

43) Chicago Fire Department firefighter Orroyo, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

44) Chicago Fire Department firefighter unknown name, employee number 21216, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding medical treatment provided to LUMAR in the District 11 lockup.

45) Casey Tencate, address currently unknown, this individual may have knowledge relating to LUMAR's prior arrest.

46) Lauren Barrett, address currently unknown, this individual may have knowledge relating to LUMAR's prior arrest.

47) Amritpal Jawanda, MD, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

48) Sukhveer Wahi, MD, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

49) Dexter Reed, security, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

50) Katie Simmons, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

51) Maria Vega, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

52) Monique Zkson, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

53) Erica Cook, c/o Madison Family Health Center, 388 W. Madison, Chicago, Illinois. This individual may have knowledge regarding LUMAR's conduct prior to his arrest on August 18, 2016.

54) Erik Spann, last known address 426 North Harding Avenue, Chicago, Illinois. This individual may have knowledge regarding LUMAR's suicide attempt, statements, and actions taken immediately after LUMAR's suicide attempt.

55) Civilian Office of Police Accountability ("COPA") Investigator Bruce Dean, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

56) COPA Investigator Chantelle Hill, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual

may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

57) COPA Investigator William Abbruzzese, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

58) COPA Investigator Joshua Hunt, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

59) COPA Investigator Catherina Oliveri, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported

created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

60) COPA Investigator Kelvin Lett, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

61) COPA Investigator Linda Franco, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

62) COPA Investigator Adam Pfeifer, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

63) COPA Investigator Daniel Kobel, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

64) COPA Investigator S. Carter, c/o COPA 1615 W. Chicago Ave., 4th Floor, Chicago, IL 60622 (312) 746-3609. During litigation of this matter, this individual would be represented at depositions and/or trial by a City of Chicago Department of Law representative. This individual may have knowledge or information regarding the investigation following LUMAR's suicide attempt, including but not limited to their observations and actions, reported created by IPRA/COPA, reports and documents obtained by IPRA/COPA, witness statements, and any findings, conclusions, observations, and/or evaluations made during the IPRA/COPA investigation.

65) Chicago Police Chief Wayne M. Gulliford, to be contacted through counsel for Defendant City of Chicago only. This individual may have knowledge regarding the Chicago Police Department policy as to holding arrestees detained on arrest warrants issued outside of Cook County.

66) Amar Singh, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

67) Laila Robateau, RN, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

68) Amir Vafa, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt..

69) Jonathan Hwee, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

70) Alan Matson, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

71) Ivica Vucic, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

72) Amar Shah, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

73) Jeffrey Yu, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

74) Adarsh Shukla, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

75) Christine Eden, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

76) Anthony Castelli, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

77) Laura Kozak, RN, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

78) Sandeep Khosla, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

79) Mir Yadullahi, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

80) Andrew Bokarius, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

81) Mark Chottiner, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

82) Valeria Cooper, PA, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

83) Stavros Maltezos, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

84) Keenan Wanamaker, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

85) Alin Cheran MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

86) Nancy Sibigtroth, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

87) Kukoyi Omobolawa, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

88) William Brigode, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

89) Sarah Bacje Wiig, PA, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

90) Albert Leung, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

91) Taral Doshi, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

92) Gary Merlott, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

93) Michael Rechitsky, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

94) Ryan Sullivan, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

95) Steven Flynn, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

96) Alan Hecht, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

97) David DeBruin, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

98) Richard Kim, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt..

99) Kevin Frame, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

100) Sarah Rowe, MD, c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment following LUMAR's suicide attempt.

101) Anthony Thomas, MD, c/o Quest Diagnostics Wood Dale, 1355 Mittel Boulevard, Wooddale, IL. This individual may be contacted through Quest Diagnostics. This individual may have knowledge regarding medical testing performed on LUMAR following LUMAR's suicide attempt.

102) Erika Ferguson, MD c/o Mt. Sinai Hospital in Chicago, Illinois, California and 15th Street, Chicago, IL 60608, this individual may be contacted through the Mt. Sinai legal department. This individual may have knowledge regarding LUMAR's medical treatment prior to LUMAR's suicide attempt.

103) Chief Judge Timothy C. Evans, Circuit Court of Cook County, to be contacted through legal department of the Circuit Court of Cook County. Judge Evans may have knowledge regarding his order stating that all individuals arrested by the Chicago Police Department on an arrest warrant issued by an Illinois state court outside of Cook County shall be required to appear in bond court prior to release.

104) Representative from Circuit Court of Lee County, to be contacted through legal department of Circuit Court of Lee County. This individual may have knowledge regarding the issuance of LUMAR's Lee County arrest warrant and would be expected to testify that on August 18, 2016, LUMAR's Lee County arrest warrant was valid.

105) Representative from the Office of Emergency Management and Communication ("OEMC"), to be contacted through counsel for Defendant City of Chicago only. This individual would have knowledge regarding OEMC documents and recordings and would lay foundation for OEMC documents and/or OEMC recordings.

106) Personnel from the Chicago Police Department, to be contacted through counsel for Defendant City of Chicago only. This individual(s) would be called to lay foundation for and/or to testify all Chicago Police Department records produced in this case, including, but not limited to, police reports, photographs, relevant individuals' criminal backgrounds, rap sheets,.

107) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to official Chicago Police Department policy on specific subjects, including, but not limited to, General Orders and Special Orders of the Chicago Police Department such as processing arrestees, transportation of arrestees to different facilities, and general lockup procedures.

108) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to relevant training provided to City of Chicago employees.

109) Representative(s) from the City of Chicago Police Department, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to investigations into in-custody deaths of arrestees.

110) Representative(s) from the City of Chicago, to be formally designated at a later time and to be contacted through counsel for Defendant City of Chicago only. This individual or individuals would be presented as a corporate designate(s) to testify as to investigations into allegations involving misconduct on the part of City of Chicago Police Department employees.

Investigation continues and this response is not intended to be a final list of possible witnesses in this matter. Defendants reserve the right to supplement this response as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project. Defendants also reserve the right to call any witnesses disclosed by Plaintiff at trial in this matter.

2. State the names and, if known, the addresses and telephone numbers of all persons who you believe have given written or recorded statements relevant to any party's claims or defenses. Unless you assert a privilege or work product protection against disclosure under applicable law, attach a copy of each such statement if it is in your possession, custody, or control. If not in your possession, custody, or control, state the name and, if known, the address and telephone number of each person who you believe has custody of a copy.

RESPONSE:

At this time, numerous witnesses have given statements relevant to any party's claims or defenses. Copies of the statements are being provided to Plaintiff and are contained within the documents produced as bates FCRL 1-21, 31-428, 432-437, 559-570, 571-575, 1271.

Investigation continues and this response is not intended to be a final list of people who have given written or recorded statements relevant to any party's claims or defenses. Defendants reserve the right to supplement this response as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project. Defendants also reserve the right to call any witnesses disclosed by Plaintiff at trial in this matter.

3. List the documents, electronically stored information ("ESI"), tangible things, land, or other property known by you to exist, whether or not in your possession, custody or control, that you believe may be relevant to any party's claims or defenses. To the extent the volume of any such materials makes listing them individually impracticable, you may group similar documents or ESI into categories and describe the specific categories with particularity. Include in your response the names and, if known, the addresses and telephone numbers of the custodians of the documents, ESI, or tangible things, land, or other property that are not in your possession, custody, or control. For documents and tangible things in your possession, custody, or control, you may produce them with your response, or make them available for inspection on the date of the response, instead of listing them. Production of ESI will occur in accordance with paragraph C.2 below.

RESPONSE:

Defendants refer to the following documents, which are being produced on November 17, 2017:

File Name	Production Begin	Production End
00.pdf	FCRL 000001	FCRL 000004
1.pdf	FCRL 000005	FCRL 000006
10.pdf	FCRL 000007	FCRL 000008
11.pdf	FCRL 000009	FCRL 000018

12.pdf	FCRL 000019	FCRL 000020
13.mp3	FCRL 000021	FCRL 000021
13750299 ChainOC.pdf	FCRL 000022	FCRL 000022
14.mp3	FCRL 000023	FCRL 000023
15 min Inspection log (2016, 09-07) Preservation _ Lumar.pdf	FCRL 000024	FCRL 000030
15.mp3	FCRL 000031	FCRL 000031
16.mp3	FCRL 000032	FCRL 000032
17.pdf	FCRL 000033	FCRL 000033
18.pdf	FCRL 000034	FCRL 000034
19.pdf	FCRL 000035	FCRL 000035
2.pdf	FCRL 000036	FCRL 000036
20.pdf	FCRL 000037	FCRL 000038
21.pdf	FCRL 000039	FCRL 000044
22.pdf	FCRL 000045	FCRL 000045
23.pdf	FCRL 000046	FCRL 000048
24.pdf	FCRL 000049	FCRL 000066
25.pdf	FCRL 000067	FCRL 000067
26.pdf	FCRL 000068	FCRL 000071
27.pdf	FCRL 000072	FCRL 000072
28.pdf	FCRL 000073	FCRL 000076
29.pdf	FCRL 000077	FCRL 000079
3.pdf	FCRL 000080	FCRL 000080
30.pdf	FCRL 000081	FCRL 000082
31.pdf	FCRL 000083	FCRL 000405
32.pdf	FCRL 000406	FCRL 000409
33.pdf	FCRL 000410	FCRL 000410
34.pdf	FCRL 000411	FCRL 000411
35.wav	FCRL 000412	FCRL 000412
36.pdf	FCRL 000413	FCRL 000413
37.pdf	FCRL 000414	FCRL 000415
38.pdf	FCRL 000416	FCRL 000416
39.pdf	FCRL 000417	FCRL 000417
4.pdf	FCRL 000418	FCRL 000422
40.pdf	FCRL 000423	FCRL 000423
5.pdf	FCRL 000424	FCRL 000426
6.pdf	FCRL 000427	FCRL 000428
602 Reports (2016, 09-07) Fire _ Preservation _ Lumar.pdf	FCRL 000429	FCRL 000431
7.pdf	FCRL 000432	FCRL 000433
8.pdf	FCRL 000434	FCRL 000434

9.pdf	FCRL 000435	FCRL 000437
90930001.jpg	FCRL 000438	FCRL 000438
90930002.jpg	FCRL 000439	FCRL 000439
90930003.jpg	FCRL 000440	FCRL 000440
90930004.jpg	FCRL 000441	FCRL 000441
90930005.jpg	FCRL 000442	FCRL 000442
90930006.jpg	FCRL 000443	FCRL 000443
90930007.jpg	FCRL 000444	FCRL 000444
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90930010.jpg	FCRL 000447	FCRL 000447
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90930043.jpg	FCRL 000480	FCRL 000480
90930044.jpg	FCRL 000481	FCRL 000481
90930045.jpg	FCRL 000482	FCRL 000482
90930046.jpg	FCRL 000483	FCRL 000483
90930047.jpg	FCRL 000484	FCRL 000484
90930048.jpg	FCRL 000485	FCRL 000485
90930049.jpg	FCRL 000486	FCRL 000486
90930050.jpg	FCRL 000487	FCRL 000487
90930051.jpg	FCRL 000488	FCRL 000488
90930052.jpg	FCRL 000489	FCRL 000489
A&A sheet identifying P.O. from Arrestee Transport Manifest.pdf	FCRL 000490	FCRL 000490
A&A Sheets (2016, 09-14) 2016, 08-18_Preservation_Lumar.pdf	FCRL 000491	FCRL 000521
A&A Sheets (2016, 09-14) 2016, 08-19_Preservation_Lumar.pdf	FCRL 000522	FCRL 000552
Ambulance Report - LUMAR TYLER (2016, 08-29).pdf	FCRL 000553	FCRL 000558
Area File (2016 10-25) RD# HZ398499.pdf	FCRL 000559	FCRL 000570
Arrest Report (2016, 08-22) Preservation_2016, 08-19.pdf	FCRL 000571	FCRL 000575
Arrest Report (2016, 10-25) Spann Alcorn.pdf	FCRL 000576	FCRL 000580
arrest report previous-08302016.pdf	FCRL 000581	FCRL 000585
arrest report searchpreservation-08302016.pdf	FCRL 000586	FCRL 000589
Arrestee Property Log (2016, 10-28) Alcorn.pdf	FCRL 000590	FCRL 000590
Audio Research log (2016, 09-07) Fire Preservation Lumar.pdf	FCRL 000591	FCRL 000591
Audio Research Log ADDITIONAL.pdf	FCRL 000592	FCRL 000592
Audio Research Log ADDITIONAL.pdf	FCRL 000593	FCRL 000593
Audio Research Log.pdf	FCRL 000594	FCRL 000594
Audio Research Log.pdf	FCRL 000595	FCRL 000595
Audio Research Logs (2016, 12-13) 2016, 08-18_Alcorn.pdf	FCRL 000596	FCRL 000597
Audio Research Logs (2016, 12-13) 2016, 08-19_Alcorn.pdf	FCRL 000598	FCRL 000599
BEAT 1113A.pdf	FCRL 000600	FCRL 000604
BEAT-1101.pdf	FCRL 000605	FCRL 000609

BEAT-1112A.pdf	FCRL 000610	FCRL 000613
BEAT-1123.pdf	FCRL 000614	FCRL 000631
BEAT-1124.pdf	FCRL 000632	FCRL 000643
BEAT-1130.pdf	FCRL 000644	FCRL 000647
BEAT-1134.pdf	FCRL 000648	FCRL 000668
BEAT-5832.pdf	FCRL 000669	FCRL 000673
Booking photo (2016, 08-29).pdf	FCRL 000674	FCRL 000675
Booking Photos (2016, 08-29) Previous Arrest.pdf	FCRL 000676	FCRL 000677
Case Report (2016, 10-19) RD H2 398804_Alcorn.pdf	FCRL 000678	FCRL 000679
Chain of Custody Report (2016-09- 26).pdf	FCRL 000680	FCRL 000690
Criminal History (2016, 08-22) Preservation_2016, 08-19.pdf	FCRL 000691	FCRL 000695
Criminal History (2016, 10-25) Span_Alcorn.pdf	FCRL 000696	FCRL 000698
cw1 radio 1508 hrs.mp3	FCRL 000699	FCRL 000699
cw1 radio 1508 hrs.txt	FCRL 000700	FCRL 000700
cw2 phone position pdt103 1300 to 1736 hrs.mp3	FCRL 000701	FCRL 000701
cw2 phone position pdt103 1300 to 1736 hrs.txt	FCRL 000702	FCRL 000703
cw2 radio 1300 to 1356 hrs.mp3	FCRL 000704	FCRL 000704
cw2 radio 1300 to 1356 hrs.txt	FCRL 000705	FCRL 000744
cw2 radio 1356 to 1500 hrs.txt	FCRL 000745	FCRL 000764
cw2 radio 1356 to 1500hrs.mp3	FCRL 000765	FCRL 000765
cw2 radio 1459 to 1553 hrs.mp3	FCRL 000766	FCRL 000766
cw2 radio 1459 to 1553 hrs.txt	FCRL 000767	FCRL 000787
cw2 radio 1508 hrs.txt	FCRL 000788	FCRL 000788
cw2 radio 1553 to 1736 hrs.mp3	FCRL 000789	FCRL 000789
cw2 radio 1553 to 1736 hrs.txt	FCRL 000790	FCRL 000841
cw4 radio 1508 hrs.txt	FCRL 000842	FCRL 000842
EMS North Radio 1110hrs to 1259hrs.mp3	FCRL 000843	FCRL 000843
EMS North Radio 1110hrs to 1259hrs.txt	FCRL 000844	FCRL 000882
ev 05380-111658 to 121701hrs.txt	FCRL 000883	FCRL 001008
ev 05380-121656 to 131532hrs.mp3	FCRL 001009	FCRL 001009
ev 05380-121656 to 131532hrs.txt	FCRL 001010	FCRL 001113
ev 05380-131530 to 151659hrs.mp3	FCRL 001114	FCRL 001114
ev 09530.txt	FCRL 001115	FCRL 001115
ev 09534.txt	FCRL 001116	FCRL 001116

Event Queries (2016, 12-13) 2016, 08-18_Alcorn.pdf	FCRL 001117	FCRL 001119
Event Queries (2016, 12-13) 2016, 08-19_Alcorn.pdf	FCRL 001120	FCRL 001126
Event Query (2016, 09-07) Fire _ Preservation _ Lumar.pdf	FCRL 001127	FCRL 001129
EventQuery -1623205380.pdf	FCRL 001130	FCRL 001134
EventQuery-1623206198.pdf	FCRL 001135	FCRL 001136
EventQuery-1623207170.pdf	FCRL 001137	FCRL 001139
Fingerprints (2016, 09-29).pdf	FCRL 001140	FCRL 001143
FIRE North Radio 1110hrs to 1204hrs.mp3	FCRL 001144	FCRL 001144
FIRE North Radio 1110hrs to 1204hrs.txt	FCRL 001145	FCRL 001172
Forensics (2016, 10-03).pdf	FCRL 001173	FCRL 001176
GPS-BEAT 1123-3151 W. HARRISON.xls	FCRL 001177	FCRL 001186
GPS-BEAT 1124-3151 W. HARRISON.xls	FCRL 001187	FCRL 001192
GPS-BEAT 1124-3959 W. MADISON.xls	FCRL 001193	FCRL 001196
GPS-BEAT 1130-3151 W. HARRISON.xls	FCRL 001197	FCRL 001202
GPS-BEAT 1134-3151 W. HARRISON.xls	FCRL 001203	FCRL 001214
GPS-BEAT 5832-3151 W. HARRISON.xls	FCRL 001215	FCRL 001218
In car video (2016, 09-06)preservation.pdf	FCRL 001219	FCRL 001220
Inventory 13750250 (2016, 10-31) Alcorn.pdf	FCRL 001221	FCRL 001222
Inventory Search (2016, 08-30) RD HZ397430 Preservation.pdf	FCRL 001223	FCRL 001223
LUMAR Arrestee Property Transport Manifest (2016, 10-27).pdf	FCRL 001224	FCRL 001225
Male Lockup.pdf	FCRL 001226	FCRL 001227
MAP-BEAT 1123 - 3151 W. HARRISON.pdf	FCRL 001228	FCRL 001230
MAP-BEAT 1124 - 3151 W. HARRISON.pdf	FCRL 001231	FCRL 001232
MAP-BEAT 1124-3959 W. MADISON.pdf	FCRL 001233	FCRL 001235
MAP-BEAT 1130 - 3151 W. HARRISON.pdf	FCRL 001236	FCRL 001238
MAP-BEAT 1134 - 3151 W. HARRISON.pdf	FCRL 001239	FCRL 001241

MAP-BEAT 5832 - 3151 W. HARRISON.pdf	FCRL 001242	FCRL 001243
mdt_messages_LH16721_A33-1357.pdf	FCRL 001244	FCRL 001244
mdt_messages_LH16721_E107-1298.pdf	FCRL 001245	FCRL 001246
Memo regarding Arrest Warrants.pdf	FCRL 001247	FCRL 001247
Motion for Preservation-Emergency (2016-08-26).pdf	FCRL 001248	FCRL 001251
notifications 1215 to 1300 hrs.mp3	FCRL 001252	FCRL 001252
notifications 1215 to 1300 hrs.txt	FCRL 001253	FCRL 001254
OCIR2-REDACTED.pdf	FCRL 001255	FCRL 001256
OCIR3-REDACTED.pdf	FCRL 001257	FCRL 001258
OCIR-REDACTED.pdf	FCRL 001259	FCRL 001261
OEMC CD's (2016, 12-13) Alcorn.pdf	FCRL 001262	FCRL 001265
PC Search Report (2016, 10-24).pdf	FCRL 001266	FCRL 001270
PC0A295@20160818150632.mpg	FCRL 001271	FCRL 001271
PDT & MDT (2016, 09-13).doc	FCRL 001272	FCRL 001272
PDT Beat ID LH16721.PDF	FCRL 001273	FCRL 001273
PDT Messages LH16721_1123.PDF	FCRL 001274	FCRL 001275
pdtd_messages_LH16721_1124-2726.pdf	FCRL 001276	FCRL 001285
pdtd_messages_LH16721_1130-2754.pdf	FCRL 001286	FCRL 001287
pdtd_messages_LH16721_1134-2775.pdf	FCRL 001288	FCRL 001300
Preservation Letter (2016, 09-07) EO_Tyler Lumar.pdf	FCRL 001301	FCRL 001303
Prisoner transportation Transmittal (2016, 10-20) Alcorn.pdf	FCRL 001304	FCRL 001304
Property Transmittal Report (2016, 10-28) Alcorn.pdf	FCRL 001305	FCRL 001314
Ref. CFD16-0481 Audio Log.pdf	FCRL 001315	FCRL 001315
Special Order (2017, 11-01) S06-01-02.pdf	FCRL 001316	FCRL 001321
Station Video (2017, 09-01) Dist 011.pdf	FCRL 001322	FCRL 001322
Supervisor Management Log (2017, 09-01).pdf	FCRL 001323	FCRL 001346
tempD.xml	FCRL 001347	FCRL 001348
tempV.xml	FCRL 001349	FCRL 001355
Unit Queries (2016, 12-13) 2016, 08-18 Alcorn.pdf	FCRL 001356	FCRL 001366
Watch Incident Log (2017, 09-01).pdf	FCRL 001367	FCRL 001372

z10 phone position pd119 1016 to 2155 hrs.mp3	FCRL 001373	FCRL 001373
z10 phone position pd119 1016 to 2155 hrs.txt	FCRL 001374	FCRL 001381
z10 phone position pd119 1405 to 2007 hrs.mp3	FCRL 001382	FCRL 001382
z10 phone position pd119 1405 to 2007 hrs.txt	FCRL 001383	FCRL 001383
z10 phone position pd120 1016 to 2155 hrs.mp3	FCRL 001384	FCRL 001384
z10 phone position pd120 1016 to 2155 hrs.txt	FCRL 001385	FCRL 001386
z10 phone position pd120 1405 to 2007 hrs.mp3	FCRL 001387	FCRL 001387
z10 phone position pd120 1405 to 2007 hrs.txt	FCRL 001388	FCRL 001390
z10 radio 1016 to 1117 hrs.mp3	FCRL 001391	FCRL 001391
z10 radio 1016 to 1117 hrs.txt	FCRL 001392	FCRL 001479
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z10 radio 1716 to 1816 hrs.mp3	FCRL 001902	FCRL 001902
z10 radio 1716 to 1816 hrs.txt	FCRL 001903	FCRL 001999
z10 radio 1806 to 1907 hrs.mp3	FCRL 002000	FCRL 002000
z10 radio 1806 to 1907 hrs.txt	FCRL 002001	FCRL 002072
z10 radio 1816 to 1916 hrs.mp3	FCRL 002073	FCRL 002073
z10 radio 1816 to 1916 hrs.txt	FCRL 002074	FCRL 002158
z10 radio 1906 to 2007 hrs.mp3	FCRL 002159	FCRL 002159
z10 radio 1906 to 2007 hrs.txt	FCRL 002160	FCRL 002264
z10 radio 1916 to 2055 hrs.mp3	FCRL 002265	FCRL 002265
z10 radio 1916 to 2055 hrs.txt	FCRL 002266	FCRL 002456
z10 radio 2054 to 2154 hrs.mp3	FCRL 002457	FCRL 002457
z10 radio 2054 to 2154 hrs.txt	FCRL 002458	FCRL 002577
zone 10-150822 to 160757hrs.txt	FCRL 002578	FCRL 002664

This disclosure is not intended to be a final list of possible documents to be used in this matter. Defendant reserves the right to supplement this disclosure as the investigation continues and pursuant to the Northern District Court of Illinois' Standing Order Regarding Mandatory Initial Discovery Pilot Project.

4. For each of your claims or defenses, state the facts relevant to it and the legal theories upon which it is based.

RESPONSE:

- I. Plaintiff has failed to state a claim upon which relief may be granted against Defendant City under Federal Rule of Civil Procedure 12(b)(6). The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- II. The Chicago Police Department is a non-suable entity. The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- III. The City of Chicago is immune from the imposition of punitive damages under both state and federal law. Moreover, under Illinois law, the City cannot be required to indemnify an employee for punitive damages, nor may it pay a judgment for punitive damages. 745 ILCS 10/2-102 (2014); *City of Newport v. Facts Concerts*, 453 U.S. 247, 271 (1981).
- IV. The City of Chicago cannot be held liable under 42 U.S.C. § 1983 on a *respondeat superior* theory. The factual basis and legal theory are included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.
- V. The City of Chicago is immune from liability for alleged constitutional deprivations caused unless Plaintiff can show that an individual defendant employed by the City of Chicago caused Plaintiff to suffer a constitutional injury. *City of Los Angeles v. Heller*, 475 U.S. 796, 799 (1986) (holding no *Monell* liability where no individual defendant is liable for underlying substantive claim); *Durkin v. City of Chicago*, 341 F.3d 606, 615 (7th Cir. 2003) (same). The factual basis for this defense is that Tyler Lumar attempted to commit suicide without any City of Chicago employee being put on actual notice that

Tyler Lumar was at risk of suicide or self-harm. Absent this notice, no City of Chicago employee can be liable under 42 U.S.C. § 1983. *See, e.g. Saucedo v. City of Chicago*, No. 11 C 5868, 2015 WL 3643417 (N.D.Ill. June 11, 2015) (Zagel, J.). The factual basis and legal theory are also included within the City's pending motion to dismiss, *docket no. 41*, and are incorporated herein.

- VI. To the extent that Tyler Lumar failed to mitigate any of his claimed injuries or damages, any verdict or judgment obtained by Plaintiff must be reduced by application of the principle that Tyler Lumar had a duty to mitigate, commensurate with the degree of failure to mitigate attributed to Tyler Lumar by the jury in this case. The factual basis for this defense is that Tyler Lumar failed to mitigate his potential damages relating to the arrest on an outstanding warrant by, according to the Cook County Sheriff's Department, being in possession of illegal narcotics, which thereby extended the time he was in custody.
- VII. To the extent any injuries or damages claimed by Plaintiff as proximately caused, in whole or in part, by the negligent, willful and wanton and/or other wrongful conduct on the part of the Tyler Lumar, any verdict or judgment obtained by Plaintiff must be reduced by application of the principles of comparative fault, by an amount commensurate with the degree of fault attributed to Tyler Lumar by the jury in this cause. The factual basis for this defense is that Tyler Lumar voluntarily attempted to commit suicide, an act which directly and entirely caused his physical damages.

5. Provide a computation of each category of damages claimed by you, and a description of the documents or other evidentiary material on which it is based, including materials bearing on the nature and extent of the injuries suffered. You may produce the documents or other evidentiary materials with your response instead of describing them.

RESPONSE:

Not applicable to Defendant City of Chicago.

6. Specifically identify and describe any insurance or other agreement under which an insurance business or other person or entity may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse a party for payments made by the party to satisfy the judgment. You may produce a copy of the agreement with your response instead of describing it.

RESPONSE:

On August 19, 2016, the City of Chicago was self-insured for settlements and judgments up to and including \$20 million per occurrence. For settlements or judgments covered by the City's excess liability policy in excess of \$20 million, the City has the following coverage up to \$55 million:

Argo Re Limited
\$5,000,000 per occurrence/aggregate, where applicable

Allied World Assurance Company, Ltd.
\$5,000,000 per occurrence/\$10,000,000 aggregate

Argo Re Limited
\$10,000,000 per occurrence/aggregate

Westchester Surplus Lines Insurance Company
\$15,000,000 per occurrence/aggregate, where applicable

Argo Re Limited and Allied World Assurance Company, Ltd (quote share)
\$15,000,000 per occurrence/\$15,000,000 aggregate

First Specialty Insurance Corporation
\$5,000,000 per occurrence/aggregate, where applicable

November 17, 2017

Respectfully submitted,

/s/ Shawn W. Barnett
Shawn W. Barnett
Attorney No. 6312312

Devlin Schoop, Senior Counsel
Shawn Barnett, Assistant Corporation Counsel
Allison Romelfanger, Assistant Corporation Counsel
Assistant Corporation Counsel
City of Chicago, Department of Law
30 N. LaSalle Street, Suite 900
Chicago, Illinois 60602
(312) 744-0742
Counsel for Defendant City of Chicago

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian of the Estate of Tyler Lumar)	
)	
Plaintiff)	Case No. 17 C 5859
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

**CERTIFICATION OF DEFENDANT CITY OF CHICAGO'S
RESPONSES TO MANDATORY INITIAL DISCOVERY**

Under penalties as provided by law pursuant to 28 U.S.C. §1746, I Sergeant Robert Flores, assigned to the Office of Legal Affairs, Chicago Police Department, certify that the foregoing Defendant City Of Chicago's Responses To Mandatory Initial Discovery are based on knowledge, information, and belief formed after reasonable inquiry into documents and information which have been assembled by authorized employees and counsel of the City of Chicago; and that I am informed and believe that the statements set forth in the foregoing are complete and correct as of November 17, 2017.

Signature:



Sergeant Robert Flores
Office of Legal Affairs
Chicago Police Department

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lisa Alcorn, as Plenary Guardian)	
of the Estate of Tyler Lumar)	
)	Case No. 17 C 5859
Plaintiff)	
v.)	Judge Kendall
)	
The City of Chicago, et al.)	Magistrate Judge Finnegan
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of Defendant City Of Chicago's Responses To Mandatory Initial Discovery, to be delivered by email and U.S. Mail, postage prepaid, to the individuals named below at the address on November 17, 2017.

Eileen M. O'Connor
O'Connor Law Group LLC
140 S. Dearborn, Suite 320
Chicago, IL 60603
Counsel for Plaintiff

Kevin Kocim
Anthony Zecchin
Cook County State's Attorney's Office
500 Daley Center
50 West Washington
Chicago, IL 60602
Counsel for Defendants Dart and Wlodarski

Caroline Fronczak
Jason Marx
Jessica Gomez-Feie
City of Chicago Department of Law
30 N. LaSalle, Suite 900
Chicago, IL 60602
Counsel for Defendants Warren, Vega,
Esteba, Conner, Peals, Helwink-Masters,
Jones, Alexander, Vinson, Lasch, Geyer,
O'Donnell, Gartner, Barry

/s/ Shawn W. Barnett
Shawn W. Barnett
Attorney No. 6312312

Devlin Schoop, Senior Counsel
Shawn Barnett, Assistant Corporation Counsel
Allison Romelfanger, Assistant Corporation Counsel
City of Chicago, Department of Law
30 N. LaSalle Street, Suite 900
Chicago, Illinois 60602
(312) 744-0742
Counsel for Defendant City of Chicago

EXHIBIT G

14

1 agency.

2 Q. Outside agency is what type of
3 training?

4 A. Firearms.

5 Q. Have you ever been trained -- received
6 any training in suicide prevention?

7 A. Yes.

8 Q. And when?

9 A. The last week of my sergeant's
10 training.

11 Q. Where was that training held?

12 A. The academy.

13 Q. Was that, like, in some sort of office
14 space? Like, was it an office training?

15 A. In the academy.

16 Q. Okay. Was there any -- I guess what
17 I'm asking was there any sort of simulations or is
18 this all just sort of book training and lecture
19 training?

20 A. Well, it's crisis intervention
21 training. They do have some scenarios, if that is
22 what you're asking.

23 Q. And have you ever been involved or has
any arrestee or inmate attempted to commit suicide

15

1 on your watch?

2 MS. DAVENPORT: Object to the form of
3 the question, scope. You can answer.

4 BY THE WITNESS:

5 A. Attempted, no. Make statements to say
6 that they were, yes.

7 BY MS. O'CONNOR:

8 Q. Okay. Have there ever been any
9 completed suicides on your watch?

10 A. Negative. Well, on my watch or while
11 I'm working?

12 Q. Well, maybe you can clarify. On your
13 watch would be when you are working, or no?

14 A. No. When I refer to working is when
15 I'm actually inside or out on the street doing my
16 other -- my duties out on the street. You've got to
17 be a little more specific on that because I'm not
18 sure. Because on third watch I'm sure there's been
19 suicides, but not necessarily while I'm working.

20 Q. Okay. So when I said on your watch, I
21 meant on your watch while you are working that
22 watch. So that to be true, have there ever been any
23 successful completed suicides?

24 A. Not on my watch, no.

16

1 Q. In the occasions in which you have
2 been involved or had an experience where an arrestee
3 or an inmate had made some sort of statement that
4 they were suicidal, what is the Chicago Police
5 policy in terms of what you are required to do?

6 MS. DAVENPORT: I'm just going to
7 object inasmuch as you are asking him what
8 the City of Chicago's policy is. He is not a
9 30(b)(6). You can ask him what he did when
10 he received those complaints.

11 MR. POWER: Join.

12 MS. HARRIS: Join.

13 BY MS. O'CONNOR:

14 Q. Let me back up and lay some
15 foundation. When you were initially sworn in as a
16 Chicago Police officer or sergeant, were you
17 provided with the Chicago Police Department's
18 general orders?

19 A. When I made sergeant, no.

20 Q. At any time in your career.

21 A. When I was first in patrol, when I
22 first got into the academy, when I first was hired,
23 they gave us general orders, yes.

24 Q. Okay. And as a Chicago Police officer

17

1 and then sergeant, were you required and are you
2 required to follow the Chicago Police Department's
3 general orders?

4 A. Yes.

5 Q. Okay. And because you're required to
6 follow them, you have some knowledge of what those
7 general orders are, true?

8 A. Yes.

9 Q. And you have an understanding of what
10 those general orders require you to do for a litany
11 of different scenarios, correct?

12 MS. DAVENPORT: Objection to the form
13 of that question, it's an incomplete
14 hypothetical and it's vague.

15 BY THE WITNESS:

16 A. I mean, there are -- I mean, it's what
17 the policy is for certain things. Not everything is
18 cut and dry but, yes, they're provided guidelines,
19 yes.

20 BY MS. O'CONNOR:

21 Q. Okay. And you just told me a moment
22 ago that you're required to follow them. So when
I'm asking you questions about under certain
scenarios what does the Chicago Police Department



EXHIBIT H

Jones

Page 17

1 BY THE WITNESS:
 2 A. I don't recall if I looked at any
 3 documents or not.
 4 BY MS. O'CONNOR:
 5 Q. How about in preparation for your
 6 deposition?
 7 A. I think I looked at a couple of
 8 documents.
 9 Q. Do you recall what those documents
 10 were?
 11 A. One regarding an order from
 12 Chief Gulliford who was the chief of police --
 13 Q. Okay.
 14 A. -- in the patrol division.
 15 Q. Anything else that you recall
 16 reviewing for a deposition?
 17 A. Not offhand.
 18 Q. Okay. You told me that you had been
 19 transferred to headquarters days before this
 20 incident had occurred. Do you recall what you would
 21 have been doing at headquarters specifically on
 22 August 18th of 2016?
 23 A. I believe if you had a calendar I can
 24 narrow it down a little bit, but the -- what day of

Page 18

1 the week did this happen?
 2 Q. I can tell you in a minute. Let's
 3 see, what day was it? August 18th, Thursday. So
 4 August 18th was a Thursday.
 5 A. I would have still been in the 11th
 6 District.
 7 Q. Okay. All right. Now, generally
 8 speaking, as the commanding officer of the 11th
 9 District did your job duty require you to stay at
 10 the district or did you go to various other areas of
 11 the city, other districts? I'm just trying to get
 12 an idea of what your job looked like.
 13 MS. DAVENPORT: Object to the form of
 14 that question.
 15 BY THE WITNESS:
 16 A. My focus would have been the 11th
 17 District.
 18 BY MS. O'CONNOR:
 19 Q. Okay. And when you say the "focus
 20 would have been the 11th District," what does that
 21 mean?
 22 A. Based off your question, it's
 23 foreseeable for me to go to the 10th District or
 24 bordering districts to talk to the district

Page 19

1 commanders, tac lieutenants, so on and so forth.
 2 Q. Who at the 11th District in terms of
 3 rank or position would you be the supervisor to?
 4 A. Everyone that's assigned to the 11th
 5 District.
 6 Q. Okay. So that would include the desk
 7 sergeants?
 8 A. Correct.
 9 Q. Would that include the lockup
 10 personnel?
 11 A. Correct.
 12 Q. Would that include the civilian
 13 employees that work at the 11th District?
 14 A. Correct.
 15 Q. Would that include arresting officers
 16 that brought arrestees to the 11th District?
 17 MS. DAVENPORT: Object to the form of
 18 that question, incomplete hypothetical.
 19 BY MS. O'CONNOR:
 20 Q. You can answer if you understood.
 21 A. No.
 22 Q. Who, if you know, would have been
 23 Carlos Vega's direct supervisor on August 18th of
 24 2016?

Page 20

1 MS. DAVENPORT: Just object to the
 2 form of the question. If you know.
 3 BY THE WITNESS:
 4 A. Was he assigned to the 11th District?
 5 BY MS. O'CONNOR:
 6 Q. Well, if I direct your attention to
 7 Exhibit 152.
 8 MS. DAVENPORT: This says 152A.
 9 MS. O'CONNOR: That will work.
 10 MS. DAVENPORT: Okay.
 11 MS. O'CONNOR: 152A.
 12 MS. DAVENPORT: Are you done with 190?
 13 MS. O'CONNOR: Yes.
 14 BY MS. O'CONNOR:
 15 Q. Directing your attention to the last
 16 page, the first arresting officer is identified as a
 17 D.E. Warren, second arresting officer is identified
 18 as a C. Vega. From review of 152, Deputy Chief, are
 19 you able to tell me whether or not you would have
 20 been the supervisor to those two arresting officers
 21 on August 18th of 2016?
 22 A. His sergeant would have been his
 23 immediate supervisor.
 24 Q. In any of your ranks or jobs with the

5 (Pages 17 to 20)

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Page 21

1 Chicago Police Department, sir, have you ever been
2 involved with creating policy, general orders,
3 special orders?

4 MS. DAVENPORT: Object, scope,
5 incomplete hypothetical and irrelevant to
6 this defendant's role in this lawsuit.

7 BY THE WITNESS:

8 A. No.

9 BY MS. O'CONNOR:

10 Q. Okay. We were talking a moment ago
11 that in your job as the commanding officer of the
12 11th District there were occasions in which that
13 would take you out of the 11th District. But,
14 generally speaking, would you spend most of your
15 time at the 11th District?

16 A. Within the 11th District, yes.

17 Q. Okay. And when you say "within the
18 11th District," does that mean both inside the
19 actual 11th District station and also within the
20 11th District meaning within its boundaries?

21 A. Correct.

22 Q. Okay. And during the daytime hours
23 that you were working within the 11th District in
24 August of 2016, can you approximate for me how many

Page 22

1 of those hours you would be physically at the
2 station as opposed to being in the field?

3 A. Probably would have been four,
4 five hours maybe, within the station.

5 Q. Okay. In August of 2016, do you
6 recall how many district station supervisors were
7 working at the 11th District?

8 A. No.

9 Q. Can you approximate how many? Is it
10 five? Is it ten?

11 MS. DAVENPORT: Objection, asked and
12 answered. You can answer again.

13 BY THE WITNESS:

14 A. Rephrase your question.

15 BY MS. O'CONNOR:

16 Q. Sure. Do you know who Sergeant Geyer
17 is?

18 A. I heard the name before.

19 Q. Okay. If I direct your attention back
20 to 152A, on the last page it says "approving
21 supervisor KS Geyer." Do you see where I'm reading,
22 sir?

23 A. Yes.

24 Q. Okay. Based upon your review of this

Page 23

1 arrest report, he would have been the approving
2 supervisor for the arrest of Tyler Lumar on
3 August 18th of 2016; is that correct?

4 A. Correct.

5 Q. Okay. And after reviewing the report
6 and from what you told me already, you would have
7 been considered to be Sergeant Geyer's supervisor on
8 that day; is that correct?

9 A. His lieutenant would have been his
10 immediate supervisor.

11 Q. Can you tell by looking at the report
12 who the lieutenant was on that day?

13 A. No.

14 Q. Now, back to my earlier question about
15 the sergeants, specifically Sergeant Geyer. I was
16 asking you before about whether you could tell me
17 approximately how many other district station
18 supervisors were assigned to the 11th District back
19 in August of 2016. Other than Sergeant Geyer, can
20 you tell me who those sergeants may have been?

21 MS. DAVENPORT: Just object to the
22 form of your question, it also
23 mischaracterizes.
24

Page 24

1 BY THE WITNESS:

2 A. There's multiple desk sergeants. Each
3 watch has a desk sergeant so, at a minimum, three
4 per day.

5 BY MS. O'CONNOR:

6 Q. Okay. And then in terms of
7 lieutenants per watch, on average, how many
8 lieutenants would be assigned to the 11th District
9 for each watch?

10 A. It could be from one to three.

11 Q. If I wanted to find out who the
12 lieutenant was at the 11th District on August 18th,
13 2016, where would I find that information?

14 MS. DAVENPORT: Object to the form of
15 that question.

16 BY THE WITNESS:

17 A. You would subpoena the records.

18 BY MS. O'CONNOR:

19 Q. What type of records?

20 A. The A&As.

21 Q. The A&A sheets?

22 A. Uh-huh.

23 Q. Is that a yes?

24 A. Yes.

6 (Pages 21 to 24)

Page 77

1 Q. They went to bond court? I'm sorry.
 2 A. Yeah, they went to bond court.
 3 Q. Okay. After BOP was issued,
 4 Exhibit 173, did the desk sergeants or the police
 5 officers have some discretion as to whether they
 6 could still bond certain arrestees that were
 7 arrested on out-of-county warrants out at the
 8 station? Did they have some discretion to do that
 9 depending upon the type of offense?
 10 A. No.
 11 Q. Okay. All right. I just have a few
 12 follow-up questions on a few things.
 13 Oh, switching gears. Are you
 14 aware that Tyler Lumar was refused by Cook County
 15 Jail on August 19th of 2016 after he was alleged to
 16 have brought in some form of contraband?
 17 A. Yes.
 18 Q. Okay. Was it a common occurrence that
 19 arrestees that were transported to bond court would
 20 be refused by Cook County Jail and sent back to CPD?
 21 MS. DAVENPORT: Can you read back that
 22 question?
 23 (Record read as
 24 requested.)

Page 79

1 MR. POWER: Join. Speculation.
 2 MS. DAVENPORT: Are you asking him to
 3 say as far as CPD, Cook County in its
 4 entirety, how many different districts' worth
 5 of arrestees they bounced?
 6 BY THE WITNESS:
 7 A. Can you repeat the question?
 8 BY MS. O'CONNOR:
 9 Q. Sure. So I depose some of the Cook
 10 County sheriffs, and they've testified in this case
 11 that hundreds of times they refused to accept CPD --
 12 they refused to accept arrestees that are
 13 transported from CPD because those arrestees have
 14 brought in contraband.
 15 Are you aware of that?
 16 MR. POWER: Objection, form,
 17 foundation, misstates prior testimony.
 18 MS. DAVENPORT: Join.
 19 BY THE WITNESS:
 20 A. It does occur.
 21 BY MS. O'CONNOR:
 22 Q. Okay. And when it does occur, what is
 23 the procedure at the Chicago Police Department for
 24 receiving that arrestee back into CPD custody and

Page 78

1 MS. DAVENPORT: I'm going to object as
 2 to form, foundation as to what's, quote,
 3 common in CPD.
 4 MR. POWER: Join.
 5 BY MS. O'CONNOR:
 6 Q. You can answer, sir.
 7 A. There's multiple reasons why Cook
 8 County could reject an arrestee.
 9 Q. And when you were working at the 11th
 10 District as the commanding officer, would you be
 11 notified of those occasions?
 12 A. No.
 13 Q. Okay. Who in terms of rank would be?
 14 A. The desk sergeant. If we had a watch
 15 operation lieutenant, he would have been made aware
 16 of it.
 17 Q. Okay. I understand from meeting and
 18 deposing some of the other officers that there are
 19 several reasons in which sometimes Cook County will
 20 refuse an inmate that's transferred there from CPD.
 21 But limiting my questions to those that are refused
 22 because they have been alleged to have brought in
 23 contraband, how often does that happen?
 24 MS. DAVENPORT: Form, foundation.

Page 80

1 determining whether there should be additional
 2 charges placed?
 3 MS. DAVENPORT: Object to the form of
 4 that question.
 5 BY THE WITNESS:
 6 A. That individual would have been
 7 brought back, and whatever contraband found upon him
 8 or her would have been inventoried.
 9 BY MS. O'CONNOR:
 10 Q. Okay. On the occasions in which you
 11 recall this occurring, on any of those occasions was
 12 that arrestee charged with another crime?
 13 A. Yes.
 14 Q. Okay. And when that has occurred,
 15 what are the steps CPD takes to obtain the ability
 16 to place additional charges?
 17 A. Based off the inventory, based off the
 18 information gathered from the transporting officers
 19 that Person A found this contraband on the arrestee,
 20 that would have been listed in the arrest report.
 21 The charges would have been changed or updated, and
 22 then that person would have been sent to the proper
 23 courts.
 24 Q. Okay. Are there occasions in which

20 (Pages 77 to 80)